IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA AUGUSTA DIVISION

SCOTT VINCENT,)
Plaintiff,)
) CIVIL ACTION
vs.).
•) FILE NO: CV 108 067
GERALD JONES VOLKSWAGEN, INC.,)
d/b/a GERALD JONES HONDA,)
AMERICAN HONDA MOTOR CO., INC.,)
AND TAKATA CORPORATION,)
)
Defendants.)
	_)

PLAINTIFF'S DISCLOSURE OF EXPERT REPORTS ON THE ISSUE OF DAMAGES AS PROVIDED BY FED. R. CIV. P. RULE 26(a)(2)(B)

COMES NOW, **SCOTT VINCENT**, Plaintiff herein, and attaches hereto the reports of Kathy W. Willard, M.Ed., CRC, CDMS, CCM, CLCP, VE, (Exhibit "A") and Robert D. Coston, Ph.D., (Exhibit "B") as provided by Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure within the time allowed by the Court.

Plaintiff also shows that as provided by Rule 26(a)(2)(B), the fee schedules, Curriculum Vitae, list of publications and list of deposition and trial testimony of Ms. Willard and Dr. Coston are also attached to their reports.

Plaintiff has not obtained Rule 26 reports from his treating physicians as it is Plaintiff's understanding from the language of Rule 26(a)(2) and the case law interpreting that rule that no such reports are required for such witnesses.

However, in the interest of full disclosure, Plaintiff's treating physicians, none of whom were retained or selected by Plaintiff's counsel, are expected to provide testimony concerning Plaintiff's medical care and treatment, as well as concerning their opinions about the cause and extent of his injuries, his prognosis and need for future medical, personal and rehabilitative care, and also pertaining to such other matters as may be attendant thereto. All such testimony is expected to be based upon the education, training and experience of Plaintiff's treating physicians, as well as the knowledge they acquired during the course of their treatment of Plaintiff.

This 4th day of December, 2008.

ROYAL & VAUGHAN, PC

Bv:

Kenneth L. Royal, Esq.

Georgia Bar No.: 617415

Post Office Box 14664 Savannah, Georgia 31416

Phone: 912-351-0084

JAMES E. CARTER & ASSOCIATES, LLC

By: James E. Carter

James E. Carter, Esq. Georgia Bar No.: 114400

Post office Box 22129 Savannah, Georgia 31403

Phone: 236-7200

WARLICK, TRITT, STEBBINS & MURRAY, LLP

By: Charles C. Stebbins, III

Charles C. Stebbins, III, Esq. Georgia Bar No.: 677350

Post Office Box 1495 Augusta, Georgia 30903 706 722-7543

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA AUGUSTA DIVISION

SCOTT VINCENT,)	
Plaintiff,)	
i imitili,)	CIVIL ACTION
VS.).	
)	FILE NO: CV 108 067
GERALD JONES VOLKSWAGEN, INC.,)	
d/b/a GERALD JONES HONDA,)	
AMERICAN HONDA MOTOR CO., INC.,)	
AND TAKATA CORPORATION,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of PLAINTIFF'S DISCLOSURE OF EXPERT REPORTS ON THE ISSUE OF DAMAGES PURSUANT TO FED. R. CIV. P. RULE 26(a)(2)(B) upon counsel of record via FedEx or other approved overnight courier service, properly addressed and with sufficient payment to ensure delivery to:

Charles K. Reed, Esq.
Jill Kuhn, Esq.
McKenna Long & Aldridge LLP
303 Peachtree Street, NE, Suite 5300
Atlanta, Georgia 30308

And via hand delivery to:

Marvin W. McGahee, Esq. Brennan & Wasden, LLP 411 E. Liberty Street Savannah, GA 31401 This 4th day of December, 2008.

ROYAL & VAUGHAN, PC

By:

Kenneth L. Royal, Esq. Georgia Bar No.: 617415 Attorney for Plaintiff

Post Office Box 14664 Savannah, Georgia 31416 Phone: 912-351-0084

EXHIBIT "A"

REHABILITATION AND LIFE CARE PLAN CONCERNING

SCOTT VINCENT

PREPARED BY

KATHY W. WILLARD, M.Ed., CRC, CDMS, CCM, CLCP, VE LICENSED PROFESSIONAL COUNSELOR

TABLE OF CONTENTS

I. REHABILITATION AND LIFE CARE PLAN:

Demographic/Identifying Information Referral Information Medical Records Current Functioning Social, Vocational and Educational Data Rehabilitation Planning

II. <u>LIFE CARE PLAN CHARTS</u>

III. <u>CURRICULUM VITA</u>

SECTION I

WILLARD REHABILITATION, INC.

Kathy Willard, M.Ed., LPC, CRC CDMS, CCM, VE

LuRae Ahrendt, RN, CRRN, CCM

Julie Burgess, M.Ed., CRC

Tracy Hiett, RN, CRRN, CCM

265 West Pike Street

Suite 1

Lawrenceville, GA 30045-4868

Phone:770-277-9235

Fax: 770-277-9236

REHABILITATION AND LIFE CARE PLAN

December 1, 2008

Demographic/Identifying Information:

Name:

Scott Vincent

DOB:

11/21/77

DOI:

6/12/06

Primary

Disability:

Spinal cord injury – C4 ASIA-A

Referral Information:

Scott Vincent, 31, was referred for rehabilitation assessment and appropriate rehabilitation planning by his attorney, Mr. Kenneth L. Royal, Esquire. Scott was evaluated in his home in Aiken, South Carolina and consultation was requested of his rehabilitation physician, Dr. Pamela Salazar. Given the severe and permanent nature of Mr. Vincent's injuries, medical recovery is not anticipated. Mr. Vincent's Plan is developed to provide the services and interventions Mr. Vincent needs to achieve maximum functioning and wellness. It is recognized that medical complications will occur. With enactment of Mr. Vincent's Rehabilitation and Life Care Plan it is felt that the frequency and severity of complications may be minimized.

Medical Records:

Medical records indicate that Scott Vincent was 27 years of age when injured in a motor vehicle accident with rollover. It was noted at Erlanger Health Care System that Mr. Vincent was a restrained passenger in an automobile crash with prolonged extrication. He was diagnosed at Erlanger Health System with a C4 spinal cord injury. A two-level cervical vertebrectomy with internal fixation was performed on 6/14/06. Mr. Vincent was discharged on 6/23/06 to Roger C. Peace Rehabilitation Hospital. Dr. Harold Tsai diagnosed neurogenic bladder and the

Rehabilitation and Life Care Plan Scott Vincent December 1, 2008 Page 2 of 8

patient was started on intermittent catheterizations. Mr. Vincent was inpatient at Roger C. Peace Rehabilitation Hospital until 9/1/06. He did require acute care hospitalization during his rehab stay for marked cervical retrolisthesis at C5 – C6 and required posterior stabilization from C3 through C7. Mr. Vincent developed deep vein thrombosis and also required Greenfield filter placement. His bladder was judged to be flaccid. He underwent surgery on 8/29/06 for placement of a suprapubic tube. At discharge from Roger C. Peace Rehab Hospital (9/1/06) Mr. Vincent was released to home in Aiken, South Carolina with follow-up in Augusta, Georgia at Walton Rehabilitation.

Mr. Vincent was evaluated by Dr. Pamela Salazar at Walton Rehabilitation Hospital on 9/12/06. Dr. Salazar diagnosed C4 tetraplegia, ASIA-A. Dr. Salazar noted medications to include Zanaflex, Baclofen, Zantac, Paxil, Claritin, Trazodone, Ditropan, Colace, Senokot, Dulcolax suppositories, Valium, and Aspirin. It was also noted that Mr. Vincent had no active movement below his shoulders. Dr. Salazar recommended Dr. Gerald Gordon for internal medicine follow-up and Dr. Jonathan Anderson for urological care in Aiken, South Carolina. Clonidine was prescribed for blood pressure greater than 180 systolically or severe headaches. It was also recommended that Mr. Vincent undergo a Baclofen pump trial to facilitate control of his severe spasticity.

Dr. Gordon did begin treating Mr. Vincent on 9/15/06 and his initial impression was that Mr. Vincent had a urinary tract infection and quadriplegia. Dr. Richard Eisenberg performed an EEG for Mr. Vincent on 9/22/06 and noted no epileptiform discharges. Dr. Charles Bean saw Mr. Vincent on 9/25/06 for urological consult and again urinary tract infection was noted with bladder spasms. Renal ultrasound was recommended. Dr. Bean also noted bladder stones in July 2007 as well as autonomic dysreflexia event. A cystoscopy was performed on 8/9/07 with removal of bladder stones and bladder biopsy was performed as well as changing of the suprapubic tube. It was recommended that irrigation increase and it was also noted that Mr. Vincent had chronic shoulder pain.

Rehabilitation and Life Care Plan Scott Vincent December 1, 2008 Page 3 of 8

Dr. Gerald Gordon saw Mr. Vincent in office on 10/14/07 for left leg edema up to the thigh. There was noted to be a clot in the deep femoral vessel and patient was given subcutaneous Levonox. It was noted that the patient had received a Baclofen pump and had stones removed from his bladder. Dr. Gordon diagnosed depression, peripheral neuropathic disease, deep vein thrombosis on the left and quadriplegia C3 – C4.

Dr. Jonathan Anderson evaluated Mr. Vincent's urinary status in October 2007. He did indicate neurogenic bladder, cystitis and a history of bladder stones. The recurrent cystitis was determined and cultures and continuing antibiotics were recommended with return to clinic in three months.

Mr. Vincent continued to follow-up with Dr. Pamela Salazar. In November 2007 Dr. Salazar noted that the patient was being provided with increased attendant care hours. She reported continued chronic neck and shoulder pain and that the patient was receiving in-home occupational therapy one hour per week. Dr. Salazar was continuing to refill Mr. Vincent's Baclofen pump. In January 2008 Mr. Vincent in follow-up with Augusta Rehabilitation Associates complained of neck and shoulder pain which was reported as severe. The patient could not operate the motorized wheelchair with upper extremity control and required head control. Medications were changed to include a trial of Skelaxin. In March 2008 Dr. Charles Bean noted bladder stones, blood in the urine as well as sedimentation and a neurogenic bladder. CT scan was scheduled to rule out enlarged stones. Dr. Gordon noted on March 14, 2008 that Mr. Vincent had recurrent urinary tract infections, kidney stones and bladder stones. A cystoscopy was required on 3/14/08 with retrograde pyelogram, right ureteroscopy and stone manipulation as well as right stent placement. Mr. Vincent was in Aiken Regional Hospital from 3/14/08 through 3/19/08.

Mr. Vincent underwent a CT scan of the abdomen on 7/9/08 which demonstrated a right posterior lower lobe pulmonary nodule as well as right-sided nephrolithiasis with urethral stent in place. Dr. Jonathan Anderson did indicate that Mr. Vincent was diagnosed with urosepsis and he was admitted to Aiken Regional Medical Center on 8/25/08. Diagnoses included sepsis,

Rehabilitation and Life Care Plan Scott Vincent December 1, 2008 Page 4 of 8

urosepsis likely, MRSA, quadriplegia with spasticity, a remote stone and depression. The stone was again removed and the stent was again placed. Mr. Vincent was again discharged to home on 8/30/08.

Mr. Vincent has not been rehospitalized since that date.

Current Functioning:

On August 12, 2008 in-home occupational therapy noted that Mr. Vincent was able to exercise with 1 ½ pounds of weight on his left upper extremity and 3 pounds of weight on his right upper extremity for 20 repetitions with several short rest periods. It was noted that Mr. Vincent was able to use his right hand to turn his power wheelchair on/off. Mr. Vincent does not have control of his hands or wrists but does have gross movements of his upper extremities. He cannot grasp, pinch, or manipulate objects with his hands. When in bed Mr. Vincent's upper extremities are pulled by spasticity into flex positions over his head. While in bed Mr. Vincent is not able to independently move his arms. When up in his wheelchair he can advance the chair with head controls but cannot control his upper extremities to successfully use a joystick. Mr. Vincent is dependent on others for grooming, feeding, dressing and toileting. He does continue his suprapubic catheter which is currently changed on a weekly basis. He also receives continuing occupational therapy.

Mr. Vincent's currently receives 56 hours a week of attendant care from the Head and Spinal Cord Injury Association of South Carolina through his Medicaid. CNAs are provided from 6:30 a.m. to either 4:00 or 6:00 p.m. depending upon the week day. Weekends and evening hours require the services of Mr. Vincent's mother, step-father or father. All three parents work outside the home as well as care for their son.

Mr. Vincent indicates that his greatest trouble at this time is pain in his neck and inability to utilize his upper extremities for functional activities. He is also bothered by dysreflexia generally triggered by urinary tract infections, bladder or kidney stones or, possibly, pain.

Rehabilitation and Life Care Plan Scott Vincent December 1, 2008 Page 5 of 8

Mr. Vincent does use an abdominal binder, multi-podus boots and TED hose in an attempt to manage his blood pressure.

Mr. Vincent indicates that his goals are to not rely on his parents for care, to decrease the pain in his neck, to self-feed, to utilize a joystick for wheelchair control and to engage in recreational fishing. Mr. Vincent's strengths are his attitude, willingness to work in rehabilitation, ability to cough and clear his own secretions, and a history of secretion management since injury. Complications post-injury have included ingrown toenails, urinary infections, dysreflexia, pain and an inability to weightbear.

Mr. Vincent does not have a generator for his home. He lives in a single-wide mobile home with two ramps and he sleeps in a hospital bed. The hospital bed is too small. Mr. Vincent is six feet, two inches in height and his weight is approximately 240 pounds. He reports a weight gain of approximately 40 pounds since injury. He is not engaging in any cardiovascular exercise.

Mr. Vincent does indicate a loss of memory since injury. He reports a loss of consciousness at the time of the automobile accident and some difficulty with concentration post-injury. He has not undergone neuropsychological testing. Post-injury he indicates that he sleeps a great deal, grinds his teeth and is unable to regulate his body temperature. He reports he is often chilled and he experiences needles and pins as well as a hot and cold feeling in his upper extremities. He reports that he cannot taste food as he did prior to injury and that he has some blurring of his vision. Mr. Vincent indicates he becomes dysreflexic about once a month. He denies a sensation below the nipple line and he has no movement distal to this level. Mr. Vincent is totally dependent upon others for bed mobility, transfers and transportation. He does indicate that he has a 1995 Dodge Van with a Braun One-arm Lift. He does not have wheelchair tiedowns or a raised roof for his van and reports that he must be reclined in his wheelchair to get in the van. Mr. Vincent rarely leaves home and denies recreational travel. He does have a roll-in shower in the single-wide mobile home which is partially modified. He does have a shower chair and hand-held shower head.

Rehabilitation and Life Care Plan Scott Vincent December 1, 2008 Page 6 of 8

Social, Vocational and Educational Data:

Mr. Scott Vincent is 31 years of age. He was married at the time of the automobile accident and his estranged wife, Candice, was the driver of the vehicle. This couple has been married six years, however divorce is pending. The couple's daughter, Courtney (age 2), visits her dad one day a week when Mr. Vincent's mother, Debbie Thomas, is present. Mrs. Thomas indicates that the grandchild is able to crawl up in bed with her father and knows to touch his head and face so that he can feel her presence. Mr. Vincent reports that his daughter's visits are very important to him. He would like to be able to attend school and social events important to his daughter throughout her life.

Mr. Vincent reports a 9th grade education. He indicates that he dropped out of high school when his parents were divorcing and entered work in the construction fields at age 17. He reported special education services in middle school in reading. Vocational skills for Mr. Vincent were developed on the job and he indicates that he had two years experience with Coffee Construction and a history of self-employment in house trimming. At the time of the injury Mr. Vincent was anticipating full-time work in carpentry with financial backing from Mr. Giancroce. He anticipated making \$27.50 an hour in construction. Mr. Vincent is able to describe his carpentry work as very skilled in trimming new housing construction and remodeling existing housing.

For vocational purposes, Mr. Vincent should be considered totally disabled. Neither a return to work nor vocational rehabilitation is thought to yield Mr. Vincent future earned wages.

Rehabilitation Planning:

Mr. Scott Vincent is a good candidate for evaluation of tendon transfers. Dr. Pamela Salazar concurs that a referral to The Shepherd Center in Atlanta, Georgia would give Mr. Vincent opportunity for not only tendon transfer evaluation but also assistive technology training. The goals of both tendon transfers and technology training would be to give Mr. Vincent greater control of his environment. It is hoped that Mr. Vincent would be able to operate his wheelchair with joystick (T-bar). This would lessen the aggravation to his neck with head control of his

Case 1:08-cv-00067-DHB-WLB Document 32 Filed 12/04/08 Page 16 of 89

Rehabilitation and Life Care Plan Scott Vincent December 1, 2008 Page 7 of 8

wheelchair and also improve accuracy in mobility. Improved self-esteem in community travel may be achieved with hand controls.

A tendon transfer would not return Mr. Vincent's ability to grasp or lift with hand involvement. He may, however, achieve some level of pinch between the thumb and first finger. He is able at this time to demonstrate some thumb movement and greater control may be achieved with tendon transfer. Additionally tendon transfers may improve Mr. Vincent's wrist control and thereby give him greater success in modified self-feeding (with universal cuff/splint). While these are gains are modest, they would be very significant for Mr. Vincent.

Technology training and the acquisition of appropriate electronic tools may allow Mr. Vincent to access a computer, get on the internet, turn on a fan, answer a phone, have a private telephone conversation, and possibly control his hospital bed. Changing positions in bed is not possible for Mr. Vincent. With electronic control of his bed he may be able to raise his feet, raise his head or lower the bed itself. Voice activation control of his television may allow him to turn on his television and turn it off at his discretion. The Shepherd Center in Atlanta, Georgia maintains a comprehensive assistant technology floor with all relevant equipment for spinal cord injured individuals. It is recommended that Mr. Vincent get assessment in this facility as well as appropriate training.

Mr. Vincent is currently receiving Medicaid which is paying for 56 hours a week of CNA care as well as nursing for Coumadin management and suprapubic tube changes. If Mr. Vincent should not be found eligible for Medicaid in the future, he will not have access to these services.

Mr. Vincent is hopeful that his parents and step-father may be relieved of caring for him. This client does require 24/7 nursing care. With additional training on medication management, skin integrity assessment and preventative measures Mr. Vincent may be successful in directing his care. At this time he is dependent upon others to know his medication dosages and his wellness program. Additional education is required following a neuropsychological examination. With the ability to direct his own care Mr. Vincent may be attended by CNAs with RN supervision.

Rehabilitation and Life Care Plan Scott Vincent December 1, 2008 Page 8 of 8

Mr. Vincent may live in Augusta for greater social and recreational support at Harison Heights. He would require his own nursing care at Harison Heights but would be provided social and recreational activities with others who have severe disability. Mr. Vincent, in Augusta, would be able to participate in a group with other spinal cord injured men to achieve exercise in a modified wellness program. Medical stability and emotional health will be enhanced through interaction with others.

Mr. Vincent will need to follow-up with Doctors Salazar, Gordon, Crawford, Bean/Anderson and Haas as indicated on Mr. Vincent's Rehabilitation and Life Care Plan. It should be noted that Mr. Vincent's Rehabilitation and Life Care Plan indicates the minimal services required based on Mr. Vincent's permanent spinal cord injury. Changes in health status, advances in the treatment of spinal cord injury or adjustments to medications will add additional services and interventions not identified on this Plan. Mr. Vincent's Rehabilitation and Life Care Plan should be considered the minimal services recommended for Mr. Scott Vincent.

Kart W. Willand

Kathy W. Willard, M.Ed., CRC, CDMS, CCM, CLCP, VE Licensed Professional Counselor

KW:lbr

SECTION II	
	A STATE OF THE PROPERTY OF THE
	AND THE PROPERTY OF THE PROPER

Case 1:08-cv-00067-DHB-WLB Document 32 Filed 12/04/08 Page 19 of 89 FAX NO. :7067226566 Nov. 25 2008 04:51PM P

11/24/2008 23:21

7702779236

WILLARD/AHRENDT

PAGE 02

Re: Scott Vincent

I have reviewed the Rehabilitation and Life Care Plan regarding Scott Vincent. I find the Rehabilitation and Life Care Plan dated November 24, 2008 to be an appropriate reflection of the current and future medical care needs of Scott Vincent.

Panicia Salazar, M.D.

Date

!

DOB: Nov 21, 1977 D/E: Jun 12, 2006 Date Prepared: Nov 24, 2008

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street Suite 1 Lawrenceville GA 30045		Life Ca Scott	Life Care Plan Scott Vincent	<u>a</u>	DOB: Nc D/E: Ju Date Prepared: Nc Primary Disability: Sp	Nov 21, 1977 Jun 12, 2006 Nov 24, 2008 Spinal Cord Injury
770.277.9235 Fax: 770.277.9236		Projected E	Projected Evaluations			A PART OF THE PART
How (Sorvine	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Assistive Technology Specialist	Beginnin	Every 5 years.	Assess assistive technology needs.	Per Unit \$800.00 to \$828.00	Unit cost per evaluation.	Hunter Ramseur or Shepherd Center
	Ending Life Exp.			Per Year		-
Dentist	Beginning 32 2009	Minimum of 1 time.	Evaluate Bruxism and effects of medications.	Per Unit \$100.00 to \$200.00	Unit cost per visit. Does not include oral appliance.	Dr. George Crawford Aiken SC
	Ending Life Exp.			Per Year		2
Dermatologist	Beginning 32 2009	Minimum of 1 time.	Exema evaluation.	Per Unit \$72.00 to \$100.00	Unit cost per visit.	Aiken SC
	Ending Life Exp.			Per Year		က
Home Accessibility Specialist	Beginning 32 2009	Minimum of 1 time.	Assess for accessibility and safety.	Per Unit \$2,000.00 to \$2,500.00	Unit cost per visit.	All in One Accessibility
	Ending 2009			Per Year		4
Neuro - Ophthalmologist	Beginning 32 2009	Minimum of 1 time.	Evaluate visual changes.	Per Unit \$600.00	Unit cost per visit.	Dr. Dilip Thomas
	Ending 2009			Per Year		ç

Willard Ahrendt Rehabilitation, Inc. Lawrenceville GA 30045 265 Pike Street Suite 1

770.277.9235 Fax: 770.277.9236

The Care Dan

Scott Vincent

Projected Evaluations

Primary Disability: Spinal Cord Injury Date Prepared: Nov 24, 2008

DOB: Nov 21, 1977 **D/E:** Jun 12, 2006

Beginning Ending Beginning Ending	Minimum of 1 additional.				
Ending 32 32 Ending 32 Beginn	~00°	Hardware assessment.	Per Unit \$85.00 to \$200.00	Unit cost per visit.	Dr. Melvyn Haas Aiken Neurosciences
Beginr Ending			Per Year		•
Beginning 32 Ending 32 Beginning	Exp.				9
32 Ending 32 Beginning	1 time only.	Assess cognition.	Ū.	Approx, cost per evaluation.	Walton Rehab
Ending 32 Beginning	2009		to \$2,500.00		
32 Beginning			Per Year		
Beginning	2009				7
(2)	As needed.	Monitor vision.	Per Unit \$90.00 to \$150.00	Unit cost per visit.	Aiken Ophthalmology
Ending			Per Year		
Life Exp.	Exp.				82
Orthopedist Beginning 32 200	Minimum of 1 fime.	Assess possible tendon transfer.	Per Unit \$150.00 to \$250.00	Unit cost per visit.	Peachtree Orthopedics, Atlanta
Ending Life Exp.	Exp.		Per Year		6
Pain Management Specialist Beginning 32 200	Minimum of 1 2009 time.	Assess pain management needs.	Per Unit \$150.00 to \$300.00	Unit cost per visit.	Shepherd Pain Clinic, Atlanta
Ending Life Exp.	Exp.		Рег Үеаг		10

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

Projected Evaluations

Primary Disability: Spinal Cord Injury

DOB: Nov 21, 1977

D/E: Jun 12, 2006

Date Prepared: Nov 24, 2008

Ham / Sanica	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Physiatrist	Beginnin	4 times per year.	Manage rehab care.	Per Unit \$95.00	Unit cost per visit.	Dr. Pamela Salazar
	Ending			Per Year		7
Physical Therapist Occupational Therapist	Beginning 2010	Every 2 - 3 years.	Assess home program.	Per Unit \$456.00	Unit cost per evaluation. Cost for PT & OT.	Walton Rehab
	Ending Life Exp.			Per Year		12
Recreational Therapist	Beginning 32 2009	1 time.	Modified recreation.	Per Unit \$500.00 to \$1,000.00	Unit cost per evaluation.	Shepherd Center
	Ending 2009			Per Year		13
Urologist	Beginning 32 2009	2 times per year and as needed.	Urological follow up.	885.00	Unit cost per visit.	Dr. Charles Bean Aiken Center for Urology
	Ending Life Exp.					14
Wheelchair Seating and Positioning	Beginning 32 2009	Every 3 - 5 years.	Assess wheelchair and seating needs.	Per Unit \$228.00 to \$456.00	Unit cost per evaluation.	Walton Rehab
	Ending Life Exp.		-	Per Year		15

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

DOB: Nov 21, 1977

D/E: Jun 12, 2006

Date Prepared: Nov 24, 2008

(f)
ij
<u></u>
ğ
Ž
#ic
ē
2
عَ
<u>o</u>
\vec{z}
<u> </u>
ĭ
سلسا

		Frequency/			THE PROPERTY OF THE PROPERTY O	
Item / Service	Age Year	Replacement	Purpose	Cost	Comment	Vendor
Case Management	Beginning 32 2009	10 hrs. /mo for 6 mos. As needed thereafter.	Medical, rehab and care coordination for	Per Unit \$80.00	Unit cost per hour.	To be determined.
	Ending		recovery.	Per Year		
	Life Exp.					16
Gym Membership	Beginning	Monthly.	Modified exercise.	Per Unit \$35.00	Unit cost per month.	Rehab Plus
	Endina			Per Year		
	Life Exp.					11
Occupational Therapist	Beginning	2 times per week for 6 mos.	Maximize function.	Per	Approx. unit cost per visit. Add. therapy will	Trinity Home Health
	32 2009			to \$150.00	following tendon	
	Ending			5	transier surgery.	
	32 2009					18
Physical Therapist	Beginning	As needed.		Per Unit \$125.00	Unit cost per visit.	Trinity Home Health
	32 2009			to \$150.00	tti i ustra	
	Ending			Per Year		
	Life Exp.					19
Podiatrist	Beginning 32 2009	2 - 4 times per year.	Foot care.	Per Unit \$65.00 to \$100.00	Unit cost per visit.	Dr. Mackie Walker Aiken SC
	Ending			Per Year		
	Life Exp.					20
				The state of the s		

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street Suite 1

Lawrenceville GA 30045

770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

D/E: Jun 12, 2006

DOB: Nov 21, 1977

Date Prepared: Nov 24, 2008 Primary Disability: Spinal Cord Injury

Projected Therapeutic Modalities

A DESCRIPTION OF THE PROPERTY	A STATE OF THE PERSON OF THE P					
Item / Service	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Primary Care Physician/ Internist	Beginning 32 2009	Every 1 -2 months.	Monitor medical complications.	Per Unit \$86.00 to \$124.00	Unit cost per visit.	Dr. Gerald Gordon
	Ending Life Exp.			Per Year		21
Psychologist	Beginning 32 2009	2 times per month for 6 months.	Adjustment to injury counseling.	Per Unit \$125.00 to \$320.00	Unit Unit cost per visit. \$125.00 Multiple occurrences \$320.00 may be required.	To be determined.
	Ending Life Exp.			Per Year		22

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

Wheelchair(s) / Mobility / Maintenance

Date Prepared: Nov 24, 2008 D/E: Jun 12, 2006

DOB: Nov 21, 1977

Hom / Sarvice	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Manual Wheelchair	Beginnin	Every 7 - 10 years.	Back up mobility.	Per Unit \$3,000.00	Approx. unit cost each.	Care Medical
	Ending Life Exp.			Per Year		23
Manual Wheelchair Maintenance	Beginning 32 2009	Every 2 - 3 years.	Service and repair.	Per Unit \$50.00 to \$100.00	Unit cost every 2 - 3 years.	Care Medical
	Ending Life Exp.			Per Year		24
Portable Ramps	Beginning 32 2009	1 time.	Accessibility.	Per Unit \$400.00 to \$600.00	Unit cost each.	Care Medical
	Ending 2009			Per Year		25
Power Drive Wheelchair	Beginning 31 2008	Every 5 - 7 years.	Mobility.	Per Unit \$27,000.00	Unit cost each.	National Seating & Mobility
	Ending Life Exp.			Per Year		26
Power Drive Wheelchair Maintenance	Beginning 32 2009	Annually, except	Service and repair.	Per Unit	Cost per year.	National Seating & Mobility
	Ending Life Exp.			Per Year \$1,000.00		27

Willard Ahrendt Rehabilitation, Inc.

265 Pike Street Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

Wheelchair(s) / Mobility / Maintenance

Date Prepared: Nov 24, 2008 **DOB:** Nov 21, 1977 **D/E:** Jun 12, 2006

		7007	Frequency/	Purnose	Cost	Comment	Vendor
Item / Service	añu	1001	Nepacement.				
Wheelchair Cushion	Beginning		Every 3 - 5 years.	Positioning.	Per Unit \$450.00	Unit cost each.	National Seating & Mobility
	31	2008				••••	
	Ending				Per Year		***************************************
	<u> </u>	Life Exp.					28
Wheelchair Pack	Beginning	6	Every 2 - 3 years.	Carry personal	Per Unit	Unit cost each.	Care Medical
	32	2009		llems.	\$25.00 to \$35.00		
	Ending				Per Year		
	3	Life Exp.					29

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street

Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

Orthotics/Prosthetics

Date Prepared: Nov 24, 2008 D/E: Jun 12, 2006

DOB: Nov 21, 1977

AND		Frequency/				
Item / Service	Age Year	Replacement	Purpose	Cost	Comment	Vendor
Compression Boots	Beginning 31 2008	Every 2 - 3 years.	Dysreflexia management.	Per Unit \$200.00	Unit cost per pair.	AmeriMark
	Ending Life Exp.			Per Year		30
Tendonesis Splint	Beginning 31 2008	Every 2 - 3 years.	Wrist control.	Per Unit \$1,000.00	Approx. unit cost each. Surgery may reduce need.	Previously purchased.
	Ending Life Exp.			Per Year		31

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street Lawrenceville GA 30045 Suite 1

770.277.9235 Fax: 770.277.9236

Life Care Dan

Scott Vincent

Primary Disability: Spinal Cord Injury DOB: Nov 21, 1977
D/E: Jun 12, 2006
Date Prepared: Nov 24, 2008

Durable Medical Items

			32		33		34		35		36
Vendor	Care Medical			Care Medical		Care Medical		Care Medical		Guldmann	
Comment	Unit cost each.			Cost per year.		Unit cost each. Specialty mattress / bed may be required	Witti agirig:	Unit cost each.		Unit cost each.	
Cost	Per Unit \$2,500.00	Per Year		Per Unit	Per Year \$100.00	Per Unit \$1,500.00 to \$2,000.00	Per Year	Per Unit \$160.00	Per Year	Per Unit \$6,000.00	Per Year
Purpose	Positioning.			Service and repair.		Positioning and skin integrity.		Activities of daily living.		Transfers.	
Frequency/ Replacement	Every 10 years.			Annually, except year of purchase.		Every 5 - 7 years.		Every 10 years.		1 time.	
Ana Year	Beginnir	Ending	Life Exp.	Beginning 33 2010	Ending Life Exp.	Beginning 31 2008	Ending Life Exp.	Beginning 32 2009	Ending Life Exp.	Beginning 32 2009	Ending
	rem / service Full Electric Hospital Bed - Extra Long			Full Size Adjustable Bed - Maintenance		Low Air Loss Mattress		Overbed Table		Overhead Lift	

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street Suite 1 Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

DOB: Nov 21, 1977

D/E: Jun 12, 2006

Date Prepared: Nov 24, 2008

Primary Disability: Spinal Cord Injury

Durable Medical Items

16 mm / Couning	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Overhead Lift Maintenance	Beginnín	Annually, except	Service and repair.	Per Unit	Cost per year.	To be determined.
	33 2010					
	Ending			Per Year \$200.00		
	Life Exp.			to \$400.00		37
Patient Lifter	Beginning	Every 10 - 20	Transfers.	Per Unit \$1,000.00	Unit cost each.	Care Medical
	29 2006	אָמְמּוֹס.		to \$1,200.00		
	Ending			Per Year		
	Life Exp.					38
Patient Lifter Maintenance	Beginning	Every 2 - 3 years.	Service and repair.	Per Unit \$150.00	Unit cost every 2- 3 years.	Care Medical
	32 2009		***************************************	to \$180.00		
•	Ending			Per Year		
	Life Exp.					39
Roll in Shower Commode Chair	Beginning 32 2009	Every 5 - 7 years.	Bathing.	Per Unit \$1,200.00 to \$1,500.00	Unit cost each.	Care Medical
	Ending Life Exp.			Per Year		40
Roll in Shower Commode Chair Maintenance	Beginning 33 2010	Annually, except year of purchase.	Service and repair.	Per Unit	Cost per year.	Care Medical
	Ending Lífe Exp.			Per Year \$50.00		41

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street

Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

Durable Medical Items

Date Prepared: Nov 24, 2008 Primary Disability: Spinal Cord Injury

D/E: Jun 12, 2006 DOB: Nov 21, 1977

					The state of the s	
Hom / Service	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Stander	Beginning	1 - 2 purchases.	Weight bearing.	Per Unit \$2,800.00	Unit cost each.	Care Medical
	32 2009			to \$3,200.00		
	Ending			Per Year		
	Life Exp.					42
Wedge	Beginning	Every 3 - 5 years.	Positioning.	Per Unit \$25.00	Unit cost each	Care Medical
	32 2009					
	Ending			Per Year		
	Life Exp.					43

Willard Ahrendt Rehabilitation, Inc. 770.277.9235 Fax: 770.277.9236 Lawrenceville GA 30045 265 Pike Street Suite 1

Life Care Plan

Scott Vincent

Date Prepared: Nov 24, 2008 D/E: Jun 12, 2006

DOB: Nov 21, 1977

Primary Disability: Spinal Cord Injury

Aids for Independent Function

	A Year	Frequency/ Renlacement	Purpose	Cost	Comment	Vendor
Environmental Control Unit - SciCare Light II, tash phone, bed controller	Beginnir	Every 5 - 7 years.	Maximize functioning.	Per Unit \$3,810.00	Unit cost each.	Tash Inc
	Ending			Per Year		
	Life Exp.					44
Environmental Control Unit Maintenance	Beginning 33 2010	Annually, except year of purchase.	Service and repair	Per Unit	Cost per year.	To be determined.
	Ending Life Exp.			Per Year \$150.00		45
Voice Activated Computer System - Laptop, software, head controlled mouse	Beginning 32 2009	Every 5 years.	Maximize functioning.	Per Unit \$1,500.00 to \$1,800.00	Unit cost each.	To be determined.
	Ending Life Exp.			Per Year		46
Voice Activated Computer System - Maintenance	Beginning 33 2010	Annually, except year of purchase.	Service and repair.	Per Unit	Cost per year.	To be determined.
	Ending Life Exp.			Per Year \$150.00 to \$180.00		47
Quad Fishing Pole	Beginning 32 2009	1 - 2 times.	Therapeutic recreation.	Per Unit \$200.00 to \$455.00	Unit cost each.	Adaptive Outdoorsman.com
	Ending Life Exp.			Per Year		48
		, i.e., i.e.	, , , , , , , , , , , , , , , , , , ,			1

DOB: Nov 21, 1977

D/E: Jun 12, 2006

Primary Disability: Spinal Cord Injury Date Prepared: Nov 24, 2008

Scott Vincent Supplies

Life Care Plan

Willard Ahrendt Rehabilitation, Inc.

265 Pike Street

Suite 1

770.277.9235 Fax: 770.277.9236

Lawrenceville GA 30045

How I Carrie	Age	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Abdominal Binder	Beginning 32 2009	Annually.	Dysreflexia management.	Per Unit \$25.00	Unit cost each.	Care Medical
	Ending			Per Year		Ş
	Life Exp.					
OPTION ONE -Bladder Program Suorapubic Catheter Kit	Beginning 32 2009	4 per month.	Bladder program.	Per Unit \$22.00	Unit cost per month.	UroMed
	Ending Life Exp.			Per Year		50
OPTION ONE -Bladder Program	Beginning 32 2009	1 per month.	Bladder program.	Per Unit \$8.00	Unit cost per month.	UroMed
100 Cag	Ending Life Exp.			Per Year		51
OPTION ONE -Bladder Program Bedside Bag	Beginning 32 2009	2 per month.	Bladder program.	Per Unit \$13.00	Unit cost per month.	At Home Medical
	Ending Life Exp.			Per Year		52
OPTION TWO- Bladder Program Intermittent Catheters	Beginning 32 2009	1 per day.	Bladder program.	Per Unit \$45.00 to \$60.00	Unit cost per month.	UroMed
	Ending Life Exp.			Рег Үеаг		53
				The state of the s		

Page 13

Willard Ahrendt Rehabilitation, Inc.

265 Pike Street Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Dan

Scott Vincent

Supplies

Primary Disability: Spinal Cord Injury **D/E:** Jun 12, 2006 **Date Prepared:** Nov 24, 2008

DOB: Nov 21, 1977

	Ana Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
4x4 Split Dressing	Beginnin	1 box per month.		Per Unit \$14.00	Unit cost per month.	UroMed
	32 2009	<u></u>) - -		
-	Ending			Per Year		
	Life Exp.	á				54
60 cc Syringes	Beginning 32 2009	5 per month.		Per Unit \$30.00	Unit cost per month.	UroMed
	Ending Life Exp.			Per Year		55
Alcohol Swabs	Beginning 32 2009	1 box per month.	Hygiene.	Per Unit \$3.00	Unit cost per month.	UroMed
	Ending Life Exp.			Per Year		56
KY Jelly	Beginning 32 2009	2 - 3 tubes per month.	Bowel program.	Per Unit \$6.00 to \$9.00	Unit cost per month.	UroMed
	Ending Life Exp.			Per Year		57
Nonsterile Disposable Gloves	Beginning 32 2009	2 - 3 boxes per month.	Hygiene	Per Unit \$16.00 to \$24.00	Unit cost per month.	UroMed
	Ending Life Exp.	6		Per Year		58

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Scott Vincent Supplies

Life Care Plan

Per Unit	00:	99	Unit cost per pair. Unit cost per month
\$25.00 \$34.00 er Year	34.00	~ 	
\$ a	Per \	Per V	Per V
		Hygiene.	
		2 per day.	2 per day.
Ending	Ending Life Exp.	Ending	Ending Life Exp. Beginning 32 2009 Ending
		nderpads	Underpads
	Life Exp.	Life Exp. Beginning 2 per day.	Life Exp. Beginning 2 per day. 2009 Ending

D/E: Jun 12, 2006

DOB: Nov 21, 1977

Date Prepared: Nov 24, 2008

Primary Disability: Spinal Cord Injury

rcp 3 (22) Copyright 1994-2004 TecSolutions, Inc. All Rights Reserved. * Dates are inclusive, i.e., 2003-2005 equals 3 years.

Willard Ahrendt Rehabilitation, Inc.

265 Pike Street Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

Medication(s)

Primary Disability: Spinal Cord Injury D/E: Jun 12, 2006 Date Prepared: Nov 24, 2008

DOB: Nov 21, 1977

Item / Service	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Acyclovir 400 mg.*	Beginning	2 fimes per day.			Unit cost per month. Not related to spinal	Rite Aid CVS
	32 2009	- 60		to \$32.00	cord injury.	
	Ending			Per Year		
	Life Exp.	á				61
Diazepam 2 mg.*	Beginning	4 times per day.	Muscle relaxant.	Per Unit \$22.00	Unit cost per month.	Rite Aid CVS
	32 2009	6(to \$28.00		
	Ending			Per Year		
	Life Exp.	Ġ.				. 62
Gabapentin 600 mg.*	Beginning	3 times per day.	Neuropathic pain.	Per Unit \$93.00	Unit cost per month.	Rife Aid CVS
	32 2009	61		to \$102.00		
	Ending			Per Year		
	Life Exp.	Ó				63
Hydrocodone 650 mg.*	Beginning	2 times per day.	Pain management.	Per Unit \$26.00	Unit cost per month.	Rite Aid CVS
	32 2009	O		to \$29.00		
	Ending			Per Year		
	Life Exp.	Ġ				64
			The state of the s			

^{*}Medication mary vary, however, conditions for which they are prescribed are considered chronic.

Willard Ahrendt Rehabilitation, Inc. 265 Pike Street

Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Primary Disability: Spinal Cord Injury Date Prepared: Nov 24, 2008 **DOB:** Nov 21, 1977 **D/E:** Jun 12, 2006

> Scott Vincent Medication(s)

Hem / Service	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor	
0	Beginning	2 times per day.	Pain management.	Per Unit \$20.00	Unit cost per month.	Rite Aid CVS	
(Naproxeri)	32 2009			to \$23.00			
	Ending			Per Year			". t
	Life Exp.						65
Paxil 40 mg. (Paroxetine)*	Beginning 32 2009	Daily.	Depression management.	Per Unit \$32.00 to \$36.00	Unit cost per month.	Rite Aid CVS	
	Ending			Per Year			
	Life Exp.						99
Ranitidine 150 mg.	Beginning	2 times per day.	GERD.	Per Unit \$15.00	Unit cost per month.	Rite Aid CVS	
(∠antac)*	32 2009			to \$19.00			
	Ending			Per Year			
	Life Exp.						67
Sanctura 20 mg.*	Beginning	2 tabs daily.	Bladder spasms.	Per Unit \$135.00	Unit cost per month.	Rite Aid CVS	
	32 2009			to \$144.00			
	Ending			Per Year			
	Life Exp.)	89
	A CAC	ribod are concidered	chronic				

*Medications may vary, however, conditions for which they are prescribed are considered chronic.

70

Rite Aid CVS

Unit cost per month.

Per Unit

Sleep.

1 1/2 nightly.

Beginning

Trazodone 50 mg.

2009

32

\$18.00 \$23.00

2

Per Year

69

7

Rite Aid CVS

Unit cost per month.

Per Unit

Anti Coagulant.

Daily.

Beginning

Warfarin 3 - 5 mg.

Life Exp.

Ending

2009

32

\$16.00 \$19.00

2

Per Year

72

Willard Ahrendt Rehabilitation, Inc.

265 Pike Street

Lawrenceville GA 30045 Suite 1

770,277,9235 Fax: 770,277,9236

Life Care Plan

Scott Vincent

Primary Disability: Spinal Cord Injury Date Prepared: Nov 24, 2008 D/E: Jun 12, 2006

DOB: Nov 21, 1977

		Medica	Medication(s)			
Ifem / Service	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendol
Clonidine 0.1 mg.	Beginning	As needed.	Dysreflexia.	Per t	## Unit cost per month. \$10.00 (Cost for #30)	Rite Aid CVS
				00:21# 01		
	Ending			Per Year		
	Life Exp.					
Stool Softener*	Beginning 32 2009	As needed.	Bowel.	Per Unit \$10.00	Unit cost every 2 months.	Rite Aid CVS
	Ending			Per Year		
	Life Exp.					:

Life Exp.

Ending

^{*}Medications may vary, however, conditions for which they are prescribed are considered chronic.

Page 19

Willard Ahrendt Rehabilitation, Inc. Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236 265 Pike Street Suite 1

Life Care Plan

D/E: Jun 12, 2006

DOB: Nov 21, 1977

Date Prepared: Nov 24, 2008 Primary Disability: Spinal Cord Injury

Scott Vincent

Home Care/ Facility Care

A VA SERVE TO A ANALYSIA SERVENTINI SERVENTI						
Item / Service	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
OPTION ONE	Beginning	24 hrs per day.	Monitored care.	Per Unit \$18.00	Unit cost per hour.	Southern Home Care
Attendant Care - CNA	32 2009			to \$23.00		(Rescare)
	Ending			Per Year		
	Life Exp.				A PARTIE DE LA COMPANION DE LA	71
OPTION ONE	Beginning	2 times per month.	Heavy house cleaning.	Per Unit \$65.00	Unit cost per visit.	To be determined.
Domestic Assistance				Per Year		
·	Ending Life Exp.					72
OPTION ONE	Beginning	8 - 10 hrs per		Per Unit \$10.00	Unit cost per hour.	To be determined.
House and Yard Maintenance	32 2009			-		
	Ending			Per Year		
	Life Exp.					73
OPTION ONE	Beginning 32 2009	1 time per week.	Change catheter, medication set up and assessment.	Per Unit \$120.00	Unit cost per visit.	Southern Home Care (Rescare)
	Ending Life Exp.			Per Year		74
OPTION TWO	Beginning	Monthly.		Per Unit \$2,000.00	Unit cost per month.	Harison Heights
Supported Apartment	32 2003			Dor Voor		
	Ending			D		
	Life Exp.			and the second s		75
		The second secon				

Suite 1

Lawrenceville GA 30045

770.277.9235 Fax: 770.277.9236

DOB: Nov 21, 1977

D/E: Jun 12, 2006

Primary Disability: Spinal Cord Injury Date Prepared: Nov 24, 2008

Life Care Plan

Scott Vincent

9/ Southern Home Care (Rescare) Maxim Vendor Unit cost per hour. Comment \$18.00 \$23.00 Per Unit Per Year Cost 2 Home Care/ Facility Care Monitored care. Purpose Frequency/ Replacement 24 hrs per day. 2009 Life Exp. Year Beginning Ending Age 33 Supported Apartment - Attendant Care Item / Service **OPTION TWO**

Page 21

* Dates are inclusive, i.e., 2003-2005 equals 3 years.

lcp 3 (22) Copyright 1994-2004 TecSolutions, Inc. All Rights Reserved.

Willard Ahrendt Rehabilitation, Inc. Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236 265 Pike Street Suite 1

Life Care Plan

Date Prepared: Nov 24, 2008 **DOB:** Nov 21, 1977 **D/E:** Jun 12, 2006

Primary Disability: Spinal Cord Injury

Scott Vincent

Future Medical Care Routine

		77		7.8		79		80		2
Vendor	Quest Walton Rehab Hospital		Shepherd Center		Quest		Aiken Regional Medical Center		Aiken Regional Medical Center	
Comment	Unit cost per occurrence.		Unit cost each.		Unit cost each.		Unit cost each.		Unit cost each.	
Cost	Per Unit \$185.00 to \$210.00	Per Year	Per Unit \$350.00	Per Year	Per Unit \$65.00	Per Year	Per Unit \$400.00	Per Year	Per Unit \$145.00	Per Year
Purpose	Medical follow up.				Monitor anticoagulant.		Monitor urological function.		Monitor for infection	
Frequency/ Replacement	Minimum of 1 time per year.		Minimum of 1 time.		1 time per month.		1 time per year.		3 - 4 times per year.	
Are Year	Beginnir	Ending Life Exp.	Beginning 32 2009	Ending Life Exp.	Beginning 32 2009	Ending Life Exp.	Beginning 32 2009	Ending Life Exp.	Beginning 32 2009	Ending Life Exp.
	Complete Metabolic Panel and CBC		Nerve Conduction Study		Pro Time		Renal Ultrasound		Urine Culture	

Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Date Prepared: Nov 24, 2008 **DOB:** Nov 21, 1977 **D/E:** Jun 12, 2006

Primary Disability: Spinal Cord Injury

מ בי מי	Scott Vincent

Future Medical Care Routine

Itam (Sarvice	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Urodynamics	Beginning	Every 3 - 5 years.	Monitor urological function.	Per Unit \$1,800.00 to \$2,300.00	Unit cost each.	Aiken Regional Medical Center
	Ending Life Exp.	ġ.		Per Year		82
X-Rays	Beginning 32 20	As needed. 2009	Orthopedic and respiratory follow up.	Per Unit \$65.00 to \$240.00	Approx. cost per occurrence. Cost dependent upon number of views.	Walton Rehab Hospital
	Ending			Per Year		83

Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Scott Vincent

Primary Disability: Spinal Cord Injury Date Prepared: Nov 24, 2008

D/E: Jun 12, 2006 DOB: Nov 21, 1977

Transportation

		Frequency/				:	
Item / Service	Age Year	Replacement	Purpose	Cost	Comment	Vendor	
Modified Van with Lift	Beginning	Every 7 years.	Accessible fransportation	Per Unit \$50,000.00	Unit cost each.	R & R Van Handicapped	
	32 2009			to \$60,000.00		Drivers	
	Ending			Per Year			
	Life Exp.						84

Suite 1

770.277.9235 Fax: 770.277.9236 Lawrenceville GA 30045

Life Care Plan

Primary Disability: Spinal Cord Injury Date Prepared: Nov 24, 2008 D/E: Jun 12, 2006

DOB: Nov 21, 1977

Architectural Renovation(s)

Scott Vincent

19 2009 16 Exp. 19 2010	Every 10 - 20	2002	COST	Commence	Vento
Ending Life Exp. Beginning 33 2010		Back up power source.	Per Unit \$800.00	Unit cost each.	Home Depot
Beginning 33 2010		<u>I</u>	Per Year		85
- 67	Annually, except year of purchase.	Service and repair.	Per Unit	Cost per year.	To be determined.
Ending Life Exp.			Per Year \$100.00		98
Housing Modifications 1 time.		Accessibility and safety.	Per Unit \$50,000.00	Approx. cost.	To be determined.
Ending 32 2009		1	Per Year		18

One floor house. Carport or garage with covered walkway. Accessible entrances. 36 doorw in shower, grab bars, anti scald valves and hand held shower head. Fire safety equipment

Willard Ahrendt Rehabilitation, Inc.

265 Pike Street

Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

Primary Disability: Spinal Cord Injury DOB: Nov 21, 1977
D/E: Jun 12, 2006
Date Prepared: Nov 24, 2008

Scott Vincent

Acute Medical Intervention

Annual Control of the	, , , , , , , , , , , , , , , , , , ,	***************************************				
Hom / Sorring	Age Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
Baclofen Pump Refills	Beginning	Every 3 months.	Spasticity	Per Unit \$2,650.00	Unit cost per occurrence.	Dr. Salazar
	32 2009	o				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	Ending			Per Year		
	Life Exp.					88
Baclofen Pump Replacement	Beginning	Every 5 - 7 years.	Spasticity management.	Per Unit \$20,000.00	Unit cost per occurrence.	MCG
	32 2009	<u>ග</u>	>	to \$25,000.00		
	Ending			Per Year		
	Life Exp.					89
Lithotripsy	Beginning	To be determined.	Bladder/ Kidney	Per Unit	Cost to be determined.	To be determined.
	Unknown					
	Ending			Per Year		
	Unknown				-	06

Suite 1

Lawrenceville GA 30045 770.277.9235 Fax: 770.277.9236

Life Care Plan

DOB: Nov 21, 1977

Primary Disability: Spinal Cord Injury **D/E:** Jun 12, 2006 **Date Prepared:** Nov 24, 2008

Scott Vincent

Sexual Options

	Ane Year	Frequency/ Replacement	Purpose	Cost	Comment	Vendor
OPTION ONE - Sexual Function	Beginnin	To be determined.	Sexual function.	Per Unit \$34.00	Approx. cost per month, (Cost for 10).	Rite Aid CVS Pharmacy
Medications - Viagra (Sildenatil), Cialls (Tadalafil), Levitra (Vardenafil)	Unknown			to \$155.00		
	Ending			Per Year		
	Unknown					93
OPTION TWO - Sexual Function	Beginning	To be determined.	Sexual function.	Per Unit \$160.00	Approx. cost for 6-8 doses of Alprostadil.	Rite Aid CVS Pharmacy
Penile Injections or MUSE (Medicated	Unknown			to \$260.00		
Urethral System Erection)	Ending			Per Year		
	Unknown					94
OPTION THREE - Sexual Function	Beginning	To be determined.	Sexual function.	Per Unit \$300,00	Unit cost per device. Add. cost for	ErecAid
Vacuum Frection Device	Unknown			to \$500.00	supplies.	
	Ending			Per Year		
	Unknown					95
Fertility -	Beginning	1 time.		Per Unit \$1,000.00	Est. unit cost per occurrence.	To be determined.
Sperm Harvesting	Unknown			to \$1,500.00		
	Ending			PerYear		
	Unknown					96
Fertility -	Beginning	Minimum of 1 - 2		Per Unit \$20,500.00	Est, unit cost per occurrence. Cost: MD	To be determined.
Intracytoplasmic Sperm Injection (ICSI)	Unknown	occui ences.		to \$25,200.00	fees, counseling, facility fees and	
with In Vitro Fertilization (IVF)	Ending			Per Year	meds.	
	Unknown					76
		The state of the s				

Page 26

Page 1

Copyright 1994-2004 TecSolutions, Inc. All Rights Reserved. CR 11

Life Care Plan

Willard, Ahrendt Rehabiliation Inc.

Lawrenceville, GA 30045

265 Pike Street

Scott Vincent

Primary Disability: Spinal Cord Injury

11/24/2008 DOB: 11/21/1977 **D/A**: 6/12/2006 Date Prepared:

Potential Complications

Medical complications may require skilled nursing care.
Additional services may be required.
Additional services may be required for medical complications and problems with care coordination.
Additional physician consults, testing, procedures and hospitalizations may be required.
Additional consults, testing, medications and hospitalizations may be required.

Page 2

Willard, Ahrendt Rehabiliation Inc. Lawrenceville, GA 30045 265 Pike Street

life Care Plan

Scott Vincent

11/24/2008 Date Prepared:

DOB: 11/21/1977 **D/A:** 6/12/2006 Primary Disability: Spinal Cord Injury

Potential Complications

Complication	Cost of Complication	Comment
Orthopedic Complications	Undetermined.	Additional physician consults, testing, procedures and hospitalizations may be required.
Psychological / Depression Complications	Undetermined.	Additional consults, medications and hospitalizations may be required.
Respiratory Complications	Undetermined.	Additional physician consults, testing, procedures and hospitalizations may be required.
Urological Complications	Undetermined.	Additional physician consults, testing, procedures and hospitalizations may be required.

SECTION III	

KATHRYN W. WILLARD, M.Ed., LPC, CRC, CDMS, CCM, CLCP, VE

CURRICULUM VITAE

EDUCATION:

1987: 50 Hours completed in Doctoral Program in Counseling University of Georgia

Athens, Georgia

1979: Masters in Education

Major in Rehabilitation/Vocational Counseling and Evaluation

University of Georgia

Athens, Georgia

1976: Bachelor of Arts

Major in Psychology and Elementary Education

Rutgers University Camden, New Jersey

WORK EXPERIENCE:

4/92 – Present:

Willard Rehabilitation, Inc.

Lawrenceville, Georgia

Rehabilitation Counselor/Evaluator

<u>Client Population:</u> Persons with disabilities with emphasis on services to the catastrophically injured

<u>Duties Include</u>: Rehabilitation evaluation to assist individuals in developing life goals, rehabilitation plans and vocational options compatible with physical and/or psychological abilities. Additional responsibilities include coordinating rehabilitation efforts with doctors, lawyers, and employers. Administrative responsibilities include program development and evaluation.

Work Experience (Continued):

7/81 - 4/92:

The Institute for Comprehensive Rehabilitation and Recovery

Norcross, Georgia

Director of Rehabilitation, Counselor and Evaluator

<u>Client Population:</u> Persons with disabilities with emphasis on services to the catastrophically injured. Duties included evaluation to assist injured individuals in developing life goals, rehabilitation plans and vocational options compatible with physical and/or psychological abilities. Additional responsibilities included coordinating rehabilitation efforts with doctors, lawyers, and employers and assessing appropriateness of services to be provided. Administrative responsibilities included program development and evaluation.

1/85 – Present:

Office of Hearings and Appeals, Social Security Administration

Federal Government Vocational Expert

1/80 - 5/81:

Lerrell Limited

Athens, Georgia

Counselor and Evaluator

<u>Client Population:</u> Workers' Compensation and Social Security Disability recipients

<u>Duties Included:</u> Vocational testing and counseling with job readiness training and vocational placement of clients. Research on vocational options and disabilities.

8/76 - 12/79:

Augusta Easter Seals Center

Augusta, Georgia
Counselor and Evaluator

<u>Client Population:</u> Persons with disabilities with emphasis on spinal cord injury, blindness, deafness, mental retardation and emotionally disturbed patients.

<u>Duties Included:</u> Developed and coordinated program for vocational assessment of the severely disabled including blind, deaf, multi-disabled, mentally retarded, back injured, brain injured, and emotionally disturbed patients.

LICENSES AND CERTIFICATION:

Certified Rehabilitation Counselor (1979)
Vocational Expert (1985)
Certified Disability Management Specialist (1986)
Licensed Professional Counselor (1987)
Certified Case Manager (1993)
Certified Life Care Planner (2005)

1990 Rehabilitation Counselor of the Year, Georgia

PROFESSIONAL/ACADEMIC ASSOCIATIONS AND HONORS:

1979 and 1985 Vocational Evaluation and Work Adjustment Association Annual Service Award
National Honor Society in Psychology, membership awarded in 1976
National Counseling Association
National Rehabilitation Association
International Association of Rehabilitation Professionals
International Academy of Life Care Planners
International Brain Injury Association

PRESENTATIONS:

5/30/03 – Children's Healthcare of Atlanta, Atlanta, Georgia "Planning for Your Child"

5/23/03 – ICLE, Atlanta, Georgia "Assessing Life Care Plans and Vocational Issues"

5/16/02 – Children's Healthcare of Atlanta, Atlanta, Georgia "Transition Planning for Children with Acquired Brain Injury"

3/8/02 – Case Management Society of America, Chattanooga Chapter, Chattanooga, TN "Life Care Planning"

11/2-5/00 – American Association of Physical Medicine and Rehabilitation, Annual Assembly and Technical Exhibition, San Francisco, CA "Life Care Plans, Vocational Issues, and Settlement Structure 'Hot Buttons'"

9/28-29/00 – Medical College of Georgia, Annual Symposium, Augusta, Georgia "Special Needs Child – Transition Planning – Achieving Function for the Future"

Presentations (Continued):

11/3/99 – National Organization of Social Security Claimant Representatives, New Orleans, Louisiana

"Medical, Legal, Vocational Aspects of Brain Injury"

7/29/96 – Association of Trial Lawyers of America, Boston, Massachusetts Presentation of "Damages for the Severe Burn Injury Victim"

10/10/95 – State Board of Workers' Compensation, Atlanta, Georgia "Social Security Catastrophic Designation"

8/94 - Georgia Workers' Compensation Conference

7/8/93 – Georgia Commission of Continuing Lawyer Competency Workers' Compensation and Social Security Catastrophic Cases

3/25/93 – Regional Workers' Compensation Seminars, Georgia "Vocational Issues in Catastrophic Injury"

12/92 – State Board of Workers' Compensation
"Meeting the Challenges of Community Based Treatment for Catastrophic Cases"

12/12/92 – Georgia Trial Lawyers Association "Workers' Compensation and Social Security Catastrophic Cases"

8/25/92 – State Board of Workers' Compensation
"Catastrophic Injury: Realistically Determining Vocational Feasibility"

7/28/92 – Georgia NARPPS

"Evaluation of Vocational Potential of Traumatic Brain Injury Patients"

6/13/91 – Renaissance TBI Program and North Fulton Regional Hospital "Legal Terminology and Depositions"

9/13/90 – Georgia Trial Lawyers Association "Effective Use of the Rehabilitation Experts"

8/6/90 – State Board of Workers' Compensation "Understanding Collateral Sources in Life Care Planning"

8/89 – State Board of Workers' Compensation "Catastrophic Injury Case Settlement Considerations"

8/89 – Georgia Trial Lawyers Association "Use of Life Care Plan in Litigation"

WILLARD REHABILITATION, INC.

Kathy Willard, M. Boll, LPC DRD CDMS, CCM, VF

LuRae Ahrendt, RM CRRM - CCM.

October 31, 2008

265 West Pike Street

Suite 1

Lawrenceville, GA 30045-4868

Phone: 770-277-9235 Fax: 770-277-9236

Julie Burgess, M.Ed. CP/C

Tracy Hier, RR. CERN COM . PROFESSIONAL SERVICES AGREEMENT

Kenneth L. Royal, Attorney for Scott Vincent,

(hereinafter referred to as "Chene"), hereby contracts with Willard Rehabilitation, Inc. (hereinafter "Willard Rehab) to provide rehabilitation and his care planning services at the hourly rate of Two Hundred Twenty-Five Dollars. Deposition or Testimony shall be at the hourly rate of Two Hundred Fwenty-Five Dollars.

Royal & Vaughan, P.C. shall be responsible for the payment of charges for services rendered by Willard Rehab to client and for all expenses incurred in connection therewith and shall pay said charges promptly upon receipt of billing. It is understood and agreed that failure by Royal & Vaughan, P.C. to pay for services or expenses within thirty days of billing shall authorize Willard Rehab to terminate additional services. It is understood and acknowledged that any balance due and owing beyond sixty days from the billing date shall bear interest at the rate of one and one-half percent per month or eighteen percent per annum. It is further understood and agreed that travel expenses may be requested in advance of travel and that neither reports nor testimony will be provided unless payment to Willard Rehab is current.

Any other services distinct from those provided herein, e.g., physician's services, occupational therapy services or evaluation, and physical therapy services or evaluations are not included in the agreement.

day of November

Kenneth L. Royal, Esquire

Roya/& Vaughan, P.C.

Kathy W. Willard, M.Ed., CRC, CDMS, CCM, CLCP, VE

tack willer

Licensed Professional Counselor

Articles Written by Kathryn Willard

Post High School Rehabilitation Planning

Volunteer Placement

Vocational Evaluations of Persons with Brain Injury

Sheltered Workshops

Supported Employment

What is a Vocational Counselor?

Effective Use of the Rehabilitation Expert

Damages for the Severe Burn Injury Victim

Social Security & Worker's Compensation: Meeting the Systems

Use of the Life Care Plan in Litigation

Effective Use of the Vocational Rehabilitation Specialist and the Economist

Vocational Rehabilitation in the Catastrophic Injury Case/Settlement Considerations

Using the Vocational Expert (or "How the Vocational Expert Can Be Your Friend")

Outcomes: The Medical Model?

Special Needs Child

Attorney Scheriffus, Ballard, Still, Et al. Ianet, Willoughty, Et al. Reynolds & McArthur Thomas, Means, Gillis & Seay, P.C. Beasley, Allen, Et al. Deposition – 3/3/04 Beasley, Allen, Et al. Deposition – 3/2/04 Butler, Wooten, Et al. Deposition – 4/2/04 Deposition – 4/2/04 Trial testimony – 5/3/04 Trial testimony – 5/3/04 Trial testimony – 6/25/04 Lewis & Lewis Lewis & Lewis Rogers Cuffie & Associates, P.C. Deposition – 3/2/04 Trial Testimony – 6/25/04 Trial Testimony – 6/25/04 Trial Testimony – 6/25/04 Deposition – 3/1/04 Rogers Trial Testimony – 8/19/04 Rogers Trial Testimony – 8/19/04 Rogers Trial Testimony – 8/19/04 Trial Testimony – 8/19/04 Rogers Trial Testimony – 8/19/04 Rogers Trial Testimony – 8/19/04	ALL_MALAN, DALLALA_META-CASSMERONNON, MACASTER TOTAL TO THE TAXABLE PROPERTY OF TAXABLE PROPERTY O	the state of the s	Donasition (Pactimony	Venue
Scherfflus, Ballard, Still, Et al. Ianet, Willoughty, Et al. Reynolds & McArthur Thomas, Means, Gillis & Seay, P.C. Beasley, Allen, Et al. Deposition – 3/3/04 Beasley, Allen, Et al. Deposition – 3/29/04 Butler, Wooten, Et al. Deposition – 3/29/04 Thomas W. Malone, P.C. Deposition – 3/29/04 Thomas W. Malone, P.C. Deposition – 4/20/04 Butler, Wooten, Et al. Deposition – 4/16/04 Thomas W. Malone, P.C. Deposition – 4/16/04 Taylor, Harp & Callier Trial testimony – 5/3/04 Taylor, Harp & Callier Trial Testimony – 6/25/04 Lewis & Lewis Lewis & Lewis Rogers Trial Testimony – 6/25/04 Touffia & Associates, P.C. Deposition – 3/1/04 Rogers Trial Testimony – 8/19/04 Trial Testimony – 8/19/04 Rogers Trial Testimony – 8/19/04 Trial Testimony – 8/19/04 Trial Testimony – 8/19/04	Client	Attorney	Deposition recently	The state of the s
a fanet, Willoughty, Et al. Deposition – 3/1/04 Reynolds & McArthur Deposition – 3/3/04 Thomas, Means, Gillis & Seay, P.C. Deposition – 3/4/04 Beasley, Allen, Et al. Deposition – 3/2/04 Beasley, Allen, Et al. Deposition – 3/2/04 Thomas W. Malone, P.C. Deposition – 3/29/04 Butler, Wooten, Et al. Deposition – 4/2/04 Butler, Wooten, Et al. Deposition – 4/2/04 Butler, Wooten, Et al. Deposition – 4/2/04 Conley, Sacks & Griggs, LLP Deposition – 4/2/04 Webb Lindsey & Wade Trial Testimony – 5/3/04 Lewis & Lewis Lewis & Lewis Rogers Cuffie & Associates, P.C. Deposition – 8/6/04 Cuffie & Associates, P.C. Trial Testimony – 7/1/04 Cuffie & Associates, P.C. Deposition – 8/6/04 Cuffie & Associates, P.C. Trial Testimony – 8/19/04	Sasser, Kelsey	Scherffius, Ballard, Still, Et al.	Trial Testimony – 2/19/04	Superior Court of Fulton County, GA 2003 CV 68680
a Janet, Willoughly, Et al. Reynolds & McArthur Deposition – 3/1/04 Reynolds & McArthur Deposition – 3/3/04 Thomas, Means, Gillis & Seay, P.C. Deposition – 3/4/04 Beasley, Allen, Et al. Deposition – 3/2/04 Thomas W. Malone, P.C. Deposition – 3/2/04 Butler, Wooten, Et al. Deposition – 4/2/04 Butler, Wooten, Et al. Deposition – 4/2/04 Conley, Sacks & Griggs, LLP Deposition – 4/2/04 Webb Lindsey & Wade Trial Testimony – 5/3/04 Lewis & Lewis Lewis & Lewis Rogers Cuffie & Associates, P.C. Deposition – 8/6/04 Cuffie & Associates, P.C. Deposition – 8/6/04 Trial Testimony – 6/25/04 Trial Testimony – 6/25/04 Trial Testimony – 8/19/04 Rogers Cuffie & Associates, P.C. Deposition – 8/6/04 Trial Testimony – 8/19/04	Opp 18	TO ANALONS AND ANA	10/1/6	State Court of DeKalh County GA
Reynolds & McArthur Deposition – 3/3/04 Thomas, Means, Gillis & Seay, P.C. Deposition – 3/4/04 Beasley, Allen, Et al. Deposition – 3/23/04 Beasley, Allen, Et al. Deposition – 3/23/04 Butler, Wooten, Et al. Deposition – 4/2/04 Butler, Wooten, Et al. Deposition – 4/2/04 Conley, Sacks & Griggs, LLP Deposition – 4/2/04 The Accurso Law Firm Deposition – 4/2/04 Webb Lindsey & Wade Deposition – 5/3/04 Trial Testimony – 5/3/04 Lewis & Lewis Lewis & Lewis Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Cuffie & Associates, P.C. Deposition – 8/6/04 Cuffie & Associates, P.C. Trial Testimony – 8/19/04 Trial Testimony – 1/19/04 Rogers Cuffie & Associates, P.C. Trial Testimony – 8/19/04	Harrison Olandria	Janet, Willoughty, Et al.	Deposition – 3/1/04	State Court of Dervary Courty, St.
Thomas, Means, Gillis & Seay, P.C. Beasley, Allen, Et al. Beasley, Allen, Et al. Deposition -3/9/04 Beasley, Allen, Et al. Deposition -3/23/04 Butlet, Wooten, Et al. Deposition -4/2/04 Butlet, Wooten, Et al. Conley, Sacks & Griggs, LLP The Accurso Law Firm Conley, Sacks & Griggs, LLP Taylor, Harp & Callier Taylor, Harp & Callier Trial Testimony -6/25/04 Lewis & Lewis Warshauer, Thomas, Thornton & Deposition -7/1/04 Rogers Cuffie & Associates, P.C. Deposition -3/9/04 Trial Testimony -6/25/04 Trial Testimony -6/25/04 Trial Testimony -6/25/04 Rogers Cuffie & Associates, P.C. Trial Testimony - 8/19/04 Trial Testimony - 8/19/04	Monroe Mark	Reynolds & McArthur	Deposition – 3/3/04	Superior Court of Bibb County, GA
Beasley, Allen, Et al. Beasley, Allen, Et al. Beasley, Allen, Et al. Thomas W. Malone, P.C. Butler, Wooten, Et al. Deposition – 3/29/04 Butler, Wooten, Et al. Deposition – 4/20/4 Deposition – 4/16/04 The Accurso Law Firm Conley, Sacks & Griggs, LLP Webb Lindsey & Wade Taylor, Harp & Callier Lewis & Lewis Lewis & Lewis Lewis & Lewis Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Cuffie & Associates, P.C. Deposition – 7/1/04 Rogers Trial Testimony – 6/25/04 Trial Testimony – 6/25/04 Trial Testimony – 8/19/04 Cuffie & Associates, P.C. Deposition – 8/6/04 Cuffie & Associates, P.C. Trial Testimony – 8/19/04	INDINOC, INTAIN	Thomas Means Gillis & Seav P.C.	Deposition $-3/4/04$	State Court of Fulton County, GA
Beasley, Allen, Et al. Beasley, Allen, Et al. Thomas W. Malone, P.C. Butler, Wooten, Et al. Butler, Wooten, Et al. Conley, Sacks & Griggs, LLP Webb Lindsey & Wade Taylor, Harp & Callier Lewis & Lewis Rogers Cuffie & Associates, P.C. Deposition – 3/29/04 Deposition – 4/20/04 Trial Testimony – 6/25/04 Trial Testimony – 6/25/04 Trial Testimony – 6/25/04 Trial Testimony – 7/1/04 Rogers Cuffie & Associates, P.C. Deposition – 8/6/04 Trial Testimony – 8/19/04	Howard, Faylle	Boselay Allen Ft al	Deposition - 3/9/04	US Dist. Court – Middle Dist. AL,
Beasley, Allen, Et al. Thomas W. Malone, P.C. Butler, Wooten, Et al. Butler, Wooten, Et al. Deposition – 4/2/04 Butler, Wooten, Et al. The Accurso Law Firm Conley, Sacks & Griggs, LLP Webb Lindsey & Wade Taylor, Harp & Callier Taylor, Harp & Callier Lewis & Lewis Rogers Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Cuffie & Associates, P.C. Deposition – 8/6/04 Trial Testimony – 6/25/04 Trial Testimony – 6/25/04 Trial Testimony – 8/2/04 Rogers Trial Testimony – 8/19/04 Rogers Trial Testimony – 8/19/04 Rogers Trial Testimony – 8/19/04	Scott, Konine	Deasily, failed, Lt al.		Northern Division
Thomas W. Malone, P.C. Deposition – 3/29/04 Butler, Wooten, Et al. Deposition – 4/2/04 Butler, Wooten, Et al. Conley, Sacks & Griggs, LLP Webb Lindsey & Wade Taylor, Harp & Callier Taylor, Harp & Callier Lewis & Lewis Lewis & Lewis Warshauer, Thomas, Thornton & Deposition – 7/1/04 Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Cuffie & Associates, P.C. Deposition – 8/6/04 Trial Testimony – 6/25/04 Trial Testimony – 6/25/04 Trial Testimony – 8/19/04 Trial Testimony – 7/19/04 Deposition – 8/6/04 Trial Testimony – 7/19/04	Jernigan, Jeffrey	Beasley, Allen, Et al.	Deposition - 3/23/04	Circuit Court for Bullock County,
Herine Thomas W. Malone, P.C. Deposition – 3/29/04 Butler, Wooten, Et al. Deposition – 4/2/04 herine The Accurso Law Firm Deposition – 4/16/04 Conley, Sacks & Griggs, LLP Deposition – 4/20/04 Taylor, Harp & Callier Trial testimony – 5/3/04 Lewis & Lewis & Lewis Trial Testimony – 6/25/04 Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Deposition – 7/1/04 Rogers Trial Testimony – 6/25/04 Cuffie & Associates, P.C. Deposition – 8/6/04 Cuffie & Associates, P.C. Trial Testimony – 8/19/04			And the second s	Alabama
herine The Accurso Law Firm Deposition – 4/2/04 herine The Accurso Law Firm Deposition – 4/16/04 Conley, Sacks & Griggs, LLP Deposition – 4/20/04 Webb Lindsey & Wade Trial testimony – 5/19/04 Lewis & Lewis Lewis & Lewis Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Rogers Cuffic & Associates, P.C. Deposition – 8/6/04 Cuffic & Associates, P.C. Trial Testimony – 8/19/04 Cuffic & Associates, P.C. Trial Testimony – 8/19/04	Drian Can	Thomas W. Malone, P.C.	Deposition – 3/29/04	Superior Court – Hall County, GA
herine The Accurso Law Firm Deposition – 4/16/04 Conley, Sacks & Griggs, LLP Deposition – 4/20/04 Taylor, Harp & Callier Trial testimony – 5/3/04 Lewis & Lewis Lewis & Lewis Lewis & Lewis Lewis & Lewis Rogers Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Cuffie & Associates, P.C. Deposition – 8/19/04 Cuffie & Associates P.C. Trial Testimony – 8/19/04	Milton, Guthrie	Butler, Wooten, Et al.	Deposition – 4/2/04	US Dist. Court – Middle Dist of GA – Columbus Division
herine The Accurso Law Firm Deposition – 4/16/04 Conley, Sacks & Griggs, LLP Deposition – 4/20/04 Webb Lindsey & Wade Deposition – 5/3/04 Taylor, Harp & Callier Trial testimony – 5/19/04 Lewis & Lewis Lewis & Lewis Lewis & Lewis Rogers Deposition – 7/1/04 Rogers Associates, P.C. Deposition – 8/6/04 Cuffie & Associates P.C. Trial Testimony – 8/19/04			A LANGE AND THE PROPERTY AND THE PROPERT	
Conley, Sacks & Griggs, LLP Webb Lindsey & Wade Taylor, Harp & Callier Lewis & Lewis & Lewis Warshauer, Thomas, Thornton & Deposition – 7/1/04 Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Rogers Cuffie & Associates, P.C. Cuffie & Associates P.C. Trial Testimony – 6/25/04 Trial Testimony – 7/19/04 Trial Testimony – 7/19/04 Trial Testimony – 7/19/04	Beyersdorfer, Catherine		Deposition – 4/16/04	Circuit Court of Jackson County, Missouri
ne Webb Lindsey & Wade Deposition – 5/3/04 Taylor, Harp & Callier Trial testimony – 5/19/04 Lewis & Lewis Lewis & Lewis Lewis & Lewis Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Rogers Cuffie & Associates, P.C. Deposition – 8/6/04 Cuffie & Associates P.C. Trial Testimony – 8/19/04	Malcolm, Hazel	Conley, Sacks & Griggs, LLP	Deposition – 4/20/04	State Court of Fulton County, GA CA No. 02VS037658-C
Taylor, Harp & Callier Taylor, Harp & Callier Lewis & Lewis Lewis & Lewis Lewis & Lewis Trial Testimony - 6/25/04 Trial Testimony - 6/25/04 Warshauer, Thomas, Thornton & Deposition - 7/1/04 Rogers Rogers Cuffie & Associates, P.C. Trial Testimony - 7/19/04 Trial Testimony - 7/19/04 Trial Testimony - 8/19/04	The transfer the t	Wath Lindow & Wade	Deposition - 5/3/04	State Court of Fulton County, GA
Lewis & Lewis Trial Testimony – 6/25/04 Trial Testimony – 6/25/04 Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Rogers Rogers Trial Testimony – 7/19/04 Rogers Cuffie & Associates, P.C. Trial Testimony – 8/19/04 Trial Testimony – 8/19/04	Stattord-Fox, Diane	Webb Ellipsey & Water	Trial tactimony - 5/19/04	Superior Court of Muscogee
Lewis & Lewis Lewis & Lewis Lewis & Lewis Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Rogers Rogers Rogers Rogers Trial Testimony – 6/25/04 Rogers Trial Testimony – 7/19/04 Trial Testimony – 7/19/04 Cuffie & Associates, P.C. Deposition – 8/6/04 Trial Testimony – 8/19/04	Snider, Luke	Taylor, Harp & Callier	Tital testining – yildininga telili	County, Georgia
Lewis & Lewis Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Rogers Beasley, Allen, Et al. Cuffie & Associates, P.C. Deposition – 8/6/04 Trial Testimony – 7/19/04 Cuffie & Associates P.C.	Capitano, Guy, Jr.	Lewis & Lewis	Trial Testimony – 6/25/04	State of NY Supreme Court: County of Chautauqua
Warshauer, Thomas, Thornton & Deposition – 7/1/04 Rogers Beasley, Allen, Et al. Cuffie & Associates, P.C. Cuffie & Associates P.C. Trial Testimony – 8/19/04 Trial Testimony – 8/19/04	Capitano, Guy, Sr.	Lewis & Lewis	Trial Testimony – 6/25/04	State of NY Supreme Court: County of Chautauqua
Beasley, Allen, Et al. Cuffie & Associates, P.C. Cuffie & Associates P.C. Trial Testimony – 7/19/04 Trial Testimony – 8/19/04	Sluder, Greggory	Warshauer, Thomas, Thornton &	Deposition – 7/1/04	State Court of Fulton County, GA.
Cuffie & Associates, P.C. Deposition – 8/6/04 Cuffie & Associates P C Trial Testimony – 8/19/04	Turnipseed, Michael		Trial Testimony – 7/19/04	Circuit Court of Pickens County,
Cuffie & Associates, P.C. Deposition - 8/0/04 Cuffie & Associates P C Trial Testimony - 8/19/04	A manufol (A statement of the statement	A STATE OF THE PARTY OF THE PAR	VO/ 2/0 G	Superior Court of Dougherty
Cuffie & Associates P C Trial Testimony - 8/19/04	Mitchell, Barbara	Cuffie & Associates, P.C.	Deposition a/o/04	County, GA CA 03CV584-3
CUITIC & MANUAL STATE OF THE ST	Mitchell, Barbara	Cuffie & Associates, P.C.	Trial Testimony – 8/19/04	Superior Court of Dougherty

Page 1 of 9

			# #
Climt	Attorney	Deposition/Testimony	Venue
111217	, T. T. C.		The state of the s
The solution of the solution o	The state of the s		County, GA CA 03CV584-3
Nevitt, George (Neil)	Jones & Bell, P.C.	Deposition – 9/8/04	State Court of Fulton County, GA CA 03-VS-051752-G
		NO/00/0	State Court of Fulion County, GA
Thomas, Leonard	Thomas William Malone, P.C.	Leposition	CA 02VS039441H
	T 1 11 11 Callion 9. Monan	Denosition - 9/29/04	Circuit Court of 7th Judicial Circuit
King, Tom	laylor, Harp, Callier & Morgan		in and for Volusia County, FL.
			CA 2004-30339CICI Div. 31.
	Complex Willemakky Getz & Smith	Deposition - 10/14/04	Superior Court of Lowndes County,
Kowe, Demarcus	Gersion, whitegray, cert & commit		GA – CA 2002-CV-1085
7 11 12	Baolay, Allen Ft al	Deposition - 10/22/04	Circuit Court of Bullock County,
Billy Kenfroe	Dealcy, Allch, L. a.		AL
	1 0 D.11 D.C	Trial testimonv – 11/10/04	State Court of Fulton County, GA
Nevitt, George (Nell)	Jones & Den, F.C.		CA 02VS039441H
) had been	Wilmorial Stockton II D	Denosition – 11/16/04	US District Court - District of SC,
Drayton, Fatisha	Nipality Stutaton, Els		Beaufort Division
	D 1de and Ma Author	Deposition - 1/14/05	State Court of Houston County, GA
Allmon, Mairy	Keynolus and Mexician	Denosition - 1/18/05	State Court of DeKalb County, GA
Verburg, Linda Sosebee	Deviln & Kobinson	Denosition - 1/31/05	State Court of DeKalb County, GA
Delli, Thomas	Law Office of Steven Gardner	Descrition 2/7/05	118 District Court - South
Barnes, Orin	The Joye Law Firm		Carolina/Charleston Division
	Harty Dans & Ball II P	Deposition - 2/21/05	State Court of Cobb County, GA
Bobo, Grady	Hasty, Fope & Dan, Lan	Denosition - 2/25/05	Circuit Court of 9th Judicial Circuit,
Neal, Emily	buller, woolen, Et al.		Orange County, Florida
	Hooty Done & Ball II P	Trial Testimony – 3/29/05	State Court of Cobb County, GA
Bobo, Grady	Demolde & MoArthur	Deposition – 4/6/05	State Court of Bibb County,
Beck, Donald Kaymond	Reynolds & Interaction		Georgia
Y Y Y	Baseley Allen Crow Methvin Portis	Deposition – 4/22/05	Circuit Court of Lowndes County,
Womack, Natasna	& Miles, P.C.	1	AL. CA: CV-2003-138
AND COLORS OF THE COLORS OF TH	THE PARTY AND TH		

TVP:		D Tochmony	Venue
Client	Attorney	Deposition Leading	A CANADA TO THE CONTRACT OF TH
Means, John Franklin	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	Deposition – 4/22/05	Circuit Court of Lowndes County, AL. CA: CV-2003-138
Frierson, Cayce	Kilpatrick Stockton, LLP	Deposition - 4/25/05	Court of Common Pleas Fifth Judicial Circuit, State of SC; CA No. 03-CP-40-5847
Agosta, Jimmy	Hyatt & Hyatt, P.C.	Deposition – 5/3/05	State Court of Fulton County, GA CA No. 02-VS-041582-E
Monghan, Andy	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	Deposition- 5/9/05	Circuit Court of Wilcox County, AL. Civil Action No. CV-2003-09
Brailsford, Cory	Ricci~Leopold, PA	Deposition – 5/10/05	Circuit Court of 17th Judicial Circuit – Broward County, Florida
Dean, Lesteria	Thomas Blaska & Associates	Deposition – 5/16/05	Fulton County State Court CA: 04-VS-062361G
King, Elizabeth	Bullard, Garcia & Wangerin	Deposition - 5/19/05	State Court of Bibb County, GA CA: 528-21
Brady, John	Glaser Currie & Bullman, LLP	Deposition – 6/1/05	State Court Fulton County, GA CA: 03 VS 59048 E
Jenkins, Johnny Daryl	Lin Jinks	Deposition – 7/8/05	Circuit Court of Bullock County, AL CA: CV-04-71
Byrd, Jason	Beasley, Allen, Et al.	Deposition – 7/13/05	US Dist. Court – Middle Dist. of AL., Southern Division CA 1:04-CV—00477-A
Doerflinger, Christy Murphy, Cora	Kelly, Kelly & Allman Taylor, Harp & Callier	Trial Testimony – 7/29/05 Deposition – 8/2/05	USDC Middle TN 1 02 0092 Superior Court Muscogee County, GA CA: SU01CV3120

Page 3 of 9

The state of the s	Afforney	Deposition/Testimony	Venue
Clent	William V	and a second	
Murnhy Cora	Taylor, Harp & Callier	Trial Testimony – 8/17/05	Superior Court Muscogee County,
Trailing) core			CA: SU01CV3120
The second secon	0.3 K	Denosition - 9/14/05	US Dist. Court - Middle District of
Nichols, Kassie	Morgan & Morgan		FL, Tampa Division
FLL F	I am Office of Robert M. Goldberg	Deposition -9/19/05	State Court Fulton County, GA CA
Yarbrough, Thomas	Law Ollice of recent in:	7	03-VS-049694-D
The state of the s	TT Cintilar & Boyd DA	Denosition – 9/14/05	USDC-Dist. of SC, Charleston Div.
Ferran, Barbara	Haynesworm, Shiklet α Doyer, i.i.		CA No: 2:04-22433-23
	T. 1 A 11 1.4 o.1	Deposition – 11/1/05	CC of Baldwin County, AL
Eddins, Jessica	Beasley, Allen, Et al.		CA CV-2004-131
and the second s	The Designation of the Control of th	Deposition - 12/6/05	State of SC, Court of Common
Jorgensen, Warner	Whetstone, Myers, Ferkins & Loung,		Pleas CA# 4:04-171625
		Danceition - 12/20/05	Commonwealth of KY, Whitley
Baker, Jody Williams	Searcy, Denney	Deposition 12/20/20	Circuit Court, Division Two
			CA: 03-CI-00377
	A STATE OF THE PARTY OF THE PAR	Denosition - 12/18/05	SC of Fulton County, GA
Alexander, Antorio	Glasser & Glasser	Donocition 1/13/06	Super Court Henry County, GA
Williams, Javarice	Gershon, Willoughby, Getz & Smith		CA: 02-CV-1185-C
ALL A STATE OF THE	V I I I	Denocition 1/10/06	State Court DeKalb County, GA
Harn, Paul	Berger & Loewenthal, LLC	Deposition 1730 oc	CA: 04A17034-3
	5 1 411 - Carry Mathrin Et 9	Denosition - 3/6/06	Circuit Court Jefferson County, AL
Townsell, Jimmy	Beasiey, Allen, Clow, Mcuivill, Lt al.		CA: CV-05-2920
The same of the sa	FFT O V X	Deposition – 3/8/06	State Court Gwinnett County, GA
Plunkett, Rodney	I homas & Kane		CA: 05C-01717-5
A C P. S.	Dolah Ilimba Attorney at [3W	Deposition - 3/21/06	Superior Court Fulton County, GA
Matthews, Kandice	Kalph Hughes, Amonds at Lan		CA: 2005CV103591
The state of the s	Carbon Willoughby Gets & Smith	Trial testimony – 3/22/06	Super Court Henry County, GA
Williams, Javarice	Ucision, winoughof, out a small		CA: 02-CV-1185-C
Image I many I amiliary	Finks. Daniel & Crow	Deposition – 3/28/06	Circuit Court Bullock County, AL
Jenkins, Johnny Dausi	1 ALLEN 19 ACTION OF THE PROPERTY OF THE PROPE		

KATHY W. WILLARD, M. Ed., CRC, CDMS, CCM TESTIMONY AND DEPOSITIONS

And the state of t	distribution of the second of	Descrition (Factimony	Venue
Client	Attorney	Prepusation a verticory	
	Company to the contract of the		CA: CV-04-114
Kim On	O'Neal, Brown & Clark	Deposition – 4/4/06	State Court Crisp County, GA CA: 04-V-431
Reid, Abby	Scherffius, Ballard, Still & Ayres	Deposition - 4/11/06	Circuit Court Talladega County AL CA: CV-2004-282
Beasley, Elijah	Dugan, Babij, & Tolley	Deposition – 5/25/06	Circuit Court Desoto County MS CA: 2005-0053 CD
	Conley Sacks & Griggs, LLP	Trial Testimony – 6/22/06	State Court Fulton County, GA
Maicolm, Hazel		701.Cu 2 S	CA: 02-VS-03/658-C
Godbee, Carlie	Kilpatrick Stockton, LLP	Deposition	Atlanta Division CA: 1:05-CV-2707-GET
Elliott, Elijah	Newman Law Firm	Deposition - 6/29/06	State Court of Forsyth County, GA CA File No. 05SC-0315
Cossey, Joey	The Accurso Law Firm	Deposition - 8/15/06	Circuit Court City of St. Louis State of Missouri 022-09608A
	n - 11 Cturct D C	Deposition - 9/28/06	Lawrence and the second
Slaven, Jeff Focht, Nicholas	Thompson & Pantazis, P.L.L.C.	Deposition – 9/29/06	State of North Carolina County of Mecklenburg
			General Court of Justice
			Superior Court Division File No. 06-CVS-3688
Stockbauer, Chad	The Accurso Law Firm	Deposition 10/5/06	Circuit Court Jackson County, MO Case No. 03CV201124, Div. 17
Slaton, Kenneth	Butler, Wooten & Fryhofer	Deposition - 10/20/06	State Court Fulton County, GA CA: 04VS073118E
Lumpkin, Darrie	Beasley, Allen, Et al.	Deposition – 10/31/06	Circuit Court Dallas County, AL CA: CV-05-215
	The state of the s	, and a second s	

		The state of the s	/ L
The state of the s	A 440 mm Out	Deposition/Testimony	Venue
Cient	Attorney	The state of the s	- de
Williams, Jermaine	Prince Glover Law Group	Deposition – 11/21/06	CC Tuscaloosa County, AL
Cobb, Jake	Groover & Childs	Deposition - 11/28/06	US Dist. Court – Middle Dist. Macon Division CA#5:06-CV-066
Martinez, Willie Sam	Beasley, Allen, Crow, Methvin, Portis & Miles. P.C.	Deposition – 12/7/06	CA: 2005V35397
Bursey, Alisa	Malone Law Office, P.C.	Deposition – 12/11/06	Superior Court Union County GA: CA: 04-CV-413-DB
Smith, Azhane	Kilpatrick Stockton, LLP	Deposition – 12/13/06	U.S. Dist. Court Middle District of GA
			CA: 5:06-CV-089 and CA: 5706-CV-090
Thorne, Carolyne	Beasley, Allen, Crow, Methvin, Et al.	Deposition – 12/28/06	Circuit Court Montgomery County, AL - CV-2004-3069
Poteet, Bennie	Hawkins & Parnell	Deposition – 1/9/07	U.S. District Court Eastern District of TN Chattanooga Docket No. 1:05-cv-309
Atkinson, Willard	Malone Law Office	Deposition – 1/31/07	State Court Fulton County, GA CA: 2005EV000207D
Burns, Lynn	Butler, Wooten & Fryhofer	Deposition – 2/12/07	Superior Court Cobb County, GA CAF: 05-1-9609-34
Blankenship, Pamela	Malone Law Office	Deposition – 3/2/07	State Court Sumpter County, GA; CAFN: 04SV-235
Beck, Donald Ray	Reynolds McArthur	Deposition – 3/19/07	State Court Bibb County Georgia CAF No. 52974
Sherf, Refael	Malone Law Office	Deposition – 3/23/07	State Court DeKalb County, GA CAFN 06A44840-3
McKay, Arthur Bruce	Prince Glover Law Group	Deposition – 3/29/07	US Dist. Court – N. Dist. Of AL Western Division CA# CV-03-BE-0590-W
The second secon	The state of the s	The state of the s	

Page 6 of 9

KATHY W. WILLARD, M. Ed., CRC, CDMS, CCM TESTIMONY AND DEPOSITIONS

70/07	A STATE OF THE PARTY OF THE PAR	The state of the s	Descrition (Testimony	Venue
rd Malone Law Office Trial Testimony – 4/12/07 Rowen & Klonoski Deposition – 5/31/07 Rowen & Klonoski Deposition – 5/31/07 The Smolar Firm Deposition – 8/16/07 Malone Law Office Deposition – 9/11/07 Bednarz & Bednarz Deposition – 11/16/07 Jinks, Daniel & Crow Deposition – 11/16/07 Bednarz & Bednarz Deposition – 11/16/07 Malone Law Firm Deposition – 11/16/07 Malone Law Firm Deposition – 11/16/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 11/10/8 Reynolds, Horne & Survant Deposition – 1/31/08 J. Johnson & Ward Deposition – 1/31/08	Client	Attorney	Deposition resument	The control of the co
Heastey Allen, Et al. Malone Law Office Rowen & Klonoski Marsh, Richard & Bryan, P.C. Deposition – 5/21/07 The Smolar Firm Malone Law Office Deposition – 9/11/07 Bednarz & Bednarz Bednarz & Bednarz Malone Law Firm Malone Law Firm Deposition – 11/16/07 Trial testimony – 12/12/07 Malone Law Firm Deposition – 11/16/07 Malone Law Firm Deposition – 11/16/07 Malone Law Firm Deposition – 11/10/08 Malone Law Firm Deposition – 11/10/08 Reynolds, Horne & Survant Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/31/08	land, — transport of the state		Trial Testimony - 4/12/07	Circuit Court Montgomery County,
rial Testimony – 5/22/07 Rowen & Klonoski Deposition – 5/31/07 Marsh, Richard & Bryan, P.C. Deposition – 6/28/07 The Smolar Firm Deposition – 8/10/07 Malone Law Office Deposition – 9/11/07 Bednarz & Bednarz Jinks, Daniel & Crow Deposition – 11/16/07 Bednarz & Bednarz Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/31/08 Reynolds, Horne & Survant Deposition – 1/31/08 Reynolds, Ward Deposition – 1/31/08	Thorne, Carolyne		ALIGH L CHRISTALY	AL – CV-2004-3069
Rowen & Klonoski Deposition – 5/31/07 Marsh, Richard & Bryan, P.C. Deposition – 6/28/07 The Smolar Firm Deposition – 8/16/07 The Smolar Firm Deposition – 8/15/07 Malone Law Office Deposition – 1/1/6/07 Bednarz & Bednarz Jinks, Daniel & Crow Deposition – 11/16/07 Bednarz & Bednarz Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 1/7/08 Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/31/08 Reynolds, Horne & Survant Deposition – 1/31/08 Reynolds, Horne & Survant Deposition – 1/31/08 Reynolds, Horne & Ward Deposition – 1/31/08	And the second of the second o		Trial Tectimony 5/22/07	State Court Fulton County, GA
Rowen & Klonoski Deposition – 5/31/07 Marsh, Richard & Bryan, P.C. Deposition – 6/28/07 The Smolar Firm Deposition – 8/16/07 Malone Law Office Deposition – 9/11/07 Bednarz & Bednarz Deposition – 10/16/07 Jinks, Daniel & Crow Deposition – 11/16/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 1/7/08 Malone Law Firm Deposition – 1/7/08 Malone Law Firm Deposition – 1/3/08 Reynolds, Horne & Survant Deposition – 1/31/08 Reynolds, Horne & Survant Deposition – 1/31/08	Atkinson, Willard	Maione Law Unice	tidi i Stillivat	CA: 2005EV000207D
Rowen & Klonoski Deposition – 5/21/0/ Marsh, Richard & Bryan, P.C. Deposition – 6/28/07 The Smolar Firm Deposition – 8/16/07 Malone Law Office Deposition – 9/11/07 Bednarz & Bednarz Deposition – 10/16/07 Jinks, Daniel & Crow Deposition – 11/16/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 17/08 Malone Law Firm Deposition – 1/7/08 Malone Law Firm Deposition – 1/29/08 Reynolds, Horne & Survant Deposition – 1/31/08		The second secon	5/31/07	State Court Fulton County Georgia
Marsh, Richard & Bryan, P.C. The Smolar Firm Butler, Wooten & Fryhofer Malone Law Office Jinks, Daniel & Crow Bednarz & Bednarz Malone Law Firm Deposition – 17/108 Malone Law Firm Deposition – 17/108 Malone Law Firm Deposition – 1/7/08	Deterson Cheryl	Rowen & Klonoski	Deposition $-3/31/0/$	State Court attobases
Marsh, Richard & Bryan, P.C. Deposition – 6/28/07 The Smolar Firm Deposition – 8/16/07 Butler, Wooten & Fryhofer Deposition – 8/15/07 Malone Law Office Deposition – 10/16/07 Jinks, Daniel & Crow Deposition – 11/16/07 Bednarz & Bednarz Deposition – 11/16/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 12/12/08 Malone Law Firm Deposition – 1/1/08 Malone Law Firm Deposition – 1/1/08 Malone Law Firm Deposition – 1/1/08 Malone Law Firm Deposition – 1/1/108	retereous, cried y			CAF No. 04VS0/2131E
The Smolar Firm The Smolar Firm Butler, Wooten & Fryhofer Malone Law Office Deposition - 8/16/07 Bednarz & Bednarz Bednarz & Bednarz Malone Law Firm Malone Law Firm Deposition - 17/10/8 Malone Law Firm Deposition - 17/10/8 Malone Law Firm Deposition - 17/10/8 Malone Law Firm Deposition - 1/31/08 Reynolds, Horne & Survant Deposition - 1/31/08 Deposition - 1/31/08 Deposition - 1/31/08	A CONTRACT OF THE PROPERTY OF		Denosition - 6/28/07	Us Dist. Court Northern Dist. AL
The Smolar Firm Butler, Wooten & Fryhofer Malone Law Office Bednarz & Bednarz Jinks, Daniel & Crow Bednarz & Bednarz Malone Law Firm Malone Law Firm Malone Law Firm Deposition – 11/16/07 Trial testimony – 12/12/07 Malone Law Firm Deposition – 1/7/08 Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/29/08 Reynolds, Horne & Survant Deposition – 1/29/08 Reynolds, Ward Deposition – 1/31/08	Franks, John			So. Div. CA: CV 06-H-0842-S
Butler, Wooten & Fryhofer Deposition – 8/15/07 Malone Law Office Deposition – 10/16/07 Jinks, Daniel & Crow Deposition – 11/16/07 Becharz & Bednarz Deposition – 11/16/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/29/08 Reynolds, Horne & Survant Deposition – 1/31/08	THE CONTRACTOR CONTRAC	Try C - 1 - 1 - 1	Denosition - 8/10/07	State Court Cobb County, GA
Burler, Wooten & Fryhofer Deposition – 8/15/07 Malone Law Office Deposition – 9/11/07 Bednarz & Bednarz Deposition – 10/16/07 Jinks, Daniel & Crow Deposition – 11/16/07 Bednarz & Bednarz Trial testimony – 12/10/07 Malone Law Firm Deposition – 1/7/08 Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/31/08 Johnson & Ward Deposition – 1/31/08	Sanders, Austin	The Smorar Firm		CAF: 98A-771-1
Malone Law Office Bednarz & Bednarz Deposition – 9/11/07 Bednarz & Bednarz Jinks, Daniel & Crow Bednarz & Bednarz Malone Law Firm Malone Law Firm Malone Law Firm Deposition – 1/2/12/07 Malone Law Firm Deposition – 1/29/08 Reynolds, Horne & Survant Deposition – 1/31/08 Deposition – 1/31/08	i November 1		Denosition - 8/15/07	State Court Cobb County, GA
Malone Law Office Bednarz & Bednarz Bednarz & Bednarz Jinks, Daniel & Crow Bednarz & Bednarz Bednarz & Bednarz Malone Law Firm Malone Law Firm Malone Law Firm Deposition – 17/08 Reynolds, Horne & Survant Deposition – 1/29/08 Nalone Law Firm Deposition – 1/29/08 Deposition – 1/31/08	Brazelton, Crystal			CAF: 07A1956-3
Deposition - 10/16/07	The state of the s	M. I I Office	Deposition - 9/11/07	US Dist. Court Northern Dist. GA
Bednarz & Bednarz Jinks, Daniel & Crow Bednarz & Bednarz Trial testimony – 12/10/07 Malone Law Firm Malone Law Firm Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/31/08 Reynolds, Ward Deposition – 1/31/08	Landberg, Ulf	Majone Law Office		Atlanta Division
Bednarz & Bednarz Jinks, Daniel & Crow Bednarz & Bednarz Malone Law Firm Deposition - 1/7/08 Reynolds, Horne & Survant Deposition - 1/31/08 Johnson & Ward Deposition - 1/31/08				CAF No. 1:06-CV-2971
Bednarz & Bednarz Jinks, Daniel & Crow Bednarz & Bednarz Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/31/08 Jubnson & Ward Deposition – 1/31/08		The state of the s	Denosition 10/16/07	Sixth Circuit Court for
Jinks, Daniel & Crow Deposition – 11/16/07 Bednarz & Bednarz Trial testimony – 12/10/07 Malone Law Firm Deposition – 12/12/07 Reynolds, Horne & Survant Deposition – 1/29/08 Reynolds, Horne & Survant Deposition – 1/31/08	Cullum, Sam	Bednarz & Bednarz		Davidson County, TN
Jinks, Daniel & Crow Deposition – 11/16/07 Bednarz & Bednarz Trial testimony – 12/10/07 Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/31/08 Johnson & Ward Deposition – 1/31/08				Case No. 04C-2121
Jinks, Daniel & Crow Bednarz & Bednarz Malone Law Firm Malone Law Firm Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/29/08 NJ. Johnson & Ward Deposition – 1/31/08		The state of the s	Danielia 11/16/07	Circuit Court
Bednarz & Bednarz Malone Law Firm Malone Law Firm Malone Law Firm Deposition – 12/12/07 Reynolds, Horne & Survant Deposition – 1/29/08 Reynolds, Ward Deposition – 1/29/08 Johnson & Ward Deposition – 1/31/08	Curv. Anthony	Jinks, Daniel & Crow		Marine Courter Alabamon
Bednarz & Bednarz Malone Law Firm Malone Law Firm Malone Law Firm Deposition – 12/12/07 Reynolds, Horne & Survant Deposition – 1/29/08 Reynolds, Ward Deposition – 1/29/08 y J. Johnson & Ward Deposition – 1/31/08	(The second secon	Macon County, Alabamas
Malone Law Firm Malone Law Firm Malone Law Firm Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/29/08 V.J. Johnson & Ward Deposition – 1/31/08		Bednar'z & Bednarz	Trial testimony $-12/10/07$	Sixth Circuit Court for
Malone Law Firm Deposition – 12/12/07 Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/29/08 Johnson & Ward Deposition – 1/31/08	Cullum, Samuel	Dealidle & Dealidle	•	Davidson County, TN
Malone Law Firm Malone Law Firm Malone Law Firm Deposition – 17/08 Reynolds, Horne & Survant Deposition – 1/29/08 Johnson & Ward Deposition – 1/31/08				Case No. 04C-2121
Malone Law Firm Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/29/08 Johnson & Ward Deposition – 1/31/08	The state of the s	Melan I am Birm	Denosition - 12/12/07	Superior Court
Malone Law Firm Reynolds, Horne & Survant Deposition – 1/7/08 Reynolds, Horne & Survant Deposition – 1/29/08 thy J. Deposition – 1/31/08	Harris, Reginald	Maione Law Film		Dougherty County GA
Malone Law Firm Reynolds, Horne & Survant Deposition – 1/7/08 Thy J. Deposition – 1/29/08 Deposition – 1/31/08				CAF# 06CV2533-1
Malone Law Firm Reynolds, Horne & Survant Deposition – 1/29/08 Thy J. Deposition – 1/31/08			Donosition 1/7/08	State Court Fulton County, GA
Reynolds, Horne & Survant Deposition – 1/29/08 thy J. Johnson & Ward Deposition – 1/31/08	Cadet, Marie	Malone Law Firm		CAF: 2006EV001599
hy J. Johnson & Ward Deposition – 1/31/08	1 T T	Daynolds Home & Survant	Deposition – 1/29/08	
JUINIOUI & W & C	Florine, Ivionie	Lobricon & Word	Deposition – 1/31/08	State Court Fulton County, GA
	Wilson, Imothy J.	JOHNSON & Ward		

Page 7 of

Cliont	Attornev	Deposition/Testimony	Venue
CHERT	The state of the s		And the state of t
And the second s	The state of the s		CAF: 3007ev001667b
Sanders, Austin	Smolar Law Firm	Trial testimony – 2/11/08	State Court Cobb County, GA CAF: 98A-771-1
Nowell, Gloria	Beasley, Allen, Crow, Methvin, Portis	Deposition – 2/12/08	Circuit Court of Houston County, AL CV 2006-270-H
Stockbauer, Chad	The Accurso Law Firm	Trial Testimony – 2/25/08	Circuit Court Jackson County, MO Case No. 03CV201124, Div. 17
Harris, Reginald	Malone Law Firm	Trial Testimony – 3/6/08	Superior Court Dougherty County GA
Beck, Danny	Malone Law Firm	Deposition – 3/14/08	Superior Court Muscogee County, GA No. SU06CV-1303-05
Stoudemire, Shayla	Frank M. Wilson, P.C.	Deposition – 3/20/08	Circuit Court Coffee County, AL Alabama Elba Division
Coulter, Robert	O'Neal, Brown & Clark	Deposition – 4/1/08	State Court Fulton County, GA 06VS093419A
Webb, William Cody	Beasley, Allen, Crow, Methvin, Portis	Deposition – 4/10/08	Circuit Court Sumter County, AL CAF: 2005-82
Brady, Todd	Franklin, Taulbee	Deposition – 4/15/08	US Dist. Court Southern Dist of GA Brunswick Division CA# CV ~ 207-0235
Eiland, Stephen	Kilpatrick Stockton, LLP	Deposition – 5/6/08	Gwinnett County GA State Court CAF# 06-C-20145-S1
Hester, Carl	Watkins, Lourie, Roll & Chance	Deposition – 5/12/08	State Court DcKalb County, GA Case # 06A47765-4
Nance, Aunderice	Bednarz & Bednarz	Deposition – 6/23/08	Circuit Court Bradley County, 1N Case No. V-06-559
The state of the s		Adding to the Control of the Control	

	, the second sec	The state of the s	
Client	Attorney	Deposition/Testimony	Venue
VIIVIA NATALON	and the state of t	17 (A)	The state of the s
Maybaum, Erica	Daughtery, Crawford, Fuller & Brown	Deposition – 6/24/08	State Court Fulton County, GA CAF: 2007 EV002273B
Baldwin, Ethelene	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	Deposition – 7/8/08	Circuit Court of Montgomery County, Alabama
Lozano, Karina	Daughtery, Crawford, Fuller & Brown	Deposition – 8/8/08	Superior Court Hall County, GA CA# 2007-CV-3243-B
Burchfield, Doug	Warshauer, Poe & Thornton	Deposition – 8/12/08	US District Court Northern District of Georgia
			Atlanta Division CAF# 1:07-CV-1263 (TWT)
Wheeler, Lynn	Butler, Wooten & Fryhofer	Deposition – 8/15/08	State Court Clayton County, GA CAF# 2007CV05570E
Watkins, John	Warshauer, Poe & Thornton	Deposition – 8/19/08	US Dist Court – Northwestern Dist. Of Georgia
			Gainesville Division CAF# 2-07-CV-0152-RWS
Sirmans, Jeram	Beasley, Allen, Et al.	Deposition – 8/27/08	Cy-2007-900611.00
Harris, Na'im	Franklin, Taulbee, Rushing	Deposition – 8/29/08	State Court Chatham County, GA CAF# 1-03092-F
Adams, Taylor	Watkins, Lourie, Roll & Chance	Deposition – 9/30/08	Superior Court Muscogee County, GA CAF# SU07CV3504-6
Adams, Eve	Butler, Wooten & Fryhofer	Deposition – 10/27/08	Circuit Court Washington County, Arkansas Case CV07-2554-5
	The second secon		

EXHIBIT "B"

AN ECONOMIC ANALYSIS

OF THE VALUE OF

LOST EARNING CAPACITY,

CONTRIBUTIONS TO THE

HOUSEHOLD AND

LIFE CARE PLAN

MR. SCOTT W. VINCENT

DECEMBER 1, 2008

PREPARED FOR:

MR. KENNETH L. ROYAL ATTORNEY AT LAW POST OFFICE BOX 14664 SAVANNAH, GEORGIA 31416

TABLE OF CONTENTS

		<u>Page</u>
l.	General Information and Assumptions Used in Appraisal Computations	1
!].	Summary of Lost Earning Capacity and Household Contributions	3
Ш.	Lost Future Basic Earnings	4
IV.	Lost Future Employer Contributions to the Fringe Benefits Program	5
V.	Lost Future Earnings - Supplemental Income	6
VI.	Estimate of the Value of Lost Household Services	7
VII.	Discounted Value of Life Care Plan	8
VIII.	Summary of the Discounted Value of Lost Earning Capacity, Household Contributions, and Life Care Plan	10
	Certification	

APPENDICES

- A. Annuity Mortality Table for 1949, Ultimate.
- B. VITAE

TABLE I

Mr. Scott W. Vincent

GENERAL INFORMATION AND ASSUMPTIONS

USED IN APPRAISAL COMPUTATIONS

Mr. Scott W. Vincent

Date of Birth Date of Injury Age at Injury Years of Life Expectancy Years of Working Life Age at Retirement -

November 27, 1977 June 12, 2006 28.54 years 45.98 years¹ 38.46 years 67.00 years

Source:

¹Annuity Mortality Table for 1949, Ultimate.

EARNINGS:

At the time of the accident, Mr. Vincent was employed as a carpenter. He also did side jobs on weekends and in the evenings. He was able to earn \$200.00 to \$250.00 a day for these jobs, estimated at \$4,800.00 per year. For purposes of estimating the lost capacity to earn, estimated basic pay and earnings from side jobs was used.

SUMMARY OF ASSUMPTIONS

- (1) It was assumed that Mr. Scott W. Vincent's working life was 38.46 years based upon a retirement age of 67 years.
- (2) It was assumed that Mr. Scott W. Vincent's average earnings would grow at 6% per year. The judgmental growth rate factor was based upon the following factors: (a) The history of wages in the United States has reflected an upward movement in average hourly earnings. (b) The history of consumer prices in the United States has shown a steady advance. Taking these factors into consideration, it is my opinion that the above per annum growth rate in earnings for Mr. Scott W. Vincent is reasonable and conservatively predictable.
- (3) A 5% discount rate was selected.

TABLE II

Mr. Scott W. Vincent

SUMMARY OF LOST EARNING CAPACITY

AND HOUSEHOLD CONTRIBUTIONS

Past Losses:

Basic Earnings, Benefits and Household Contributions

\$132,028.73

Discounted	t	at	5%	to
November	2	:6,	200	8

Projections:

Froje	cuons.	
A.	Basic Earnings	\$1,927,035.13 ¹
B.	Employer Contributions to the Fringe Benefits Program	\$147,418.19 ²
C.	Supplemental Income	\$205,550.41 ³
D.	Economic Value of Lifetime Services	<u>\$144,357.48</u> ⁴
	TOTALS	<u>\$2,556,389.94</u>

Discounted Value of Economic Losses

\$2,556,389.94

¹See Table III.

²See Table IV.

³See Table V.

⁴See Table VI.

TABLE III

Mr. Scott W. Vincent

LOST FUTURE BASIC EARNINGS

Discounted at 5% to November 26, 2008

Projected Earnings Based on Average Annual Earnings Increase of 6% per annum¹

\$1,927,035.13

Discounted Value of Future Basic Income

\$1,927,035.13

¹In my opinion, future earnings should increase at an average annual earnings increase of 6% per annum. Therefore, the loss of future basic income would be \$1,927,035.13 discounted at 5% to November 26, 2008.

TABLE IV

Mr. Scott W. Vincent

LOST FUTURE EMPLOYER CONTRIBUTIONS

TO FRINGE BENEFITS PROGRAM

Discounted at 5% to November 26, 2008

Loss Based on a 6% Average Increase in Contributions¹

\$147,418.19

Discounted Value of Diminished Employer Contributions to the Fringe Benefits Program

\$147,418.19

¹In my opinion, a conservative estimate of future fringe benefits would be 7.65 percent of the annual salary. Therefore, the diminished future employer contributions would be \$147,418.19 discounted at 5% to November 26, 2008.

TABLE V

Mr. Scott W. Vincent

LOST FUTURE EARNINGS

SUPPLEMENTAL INCOME

Discounted at 5% to November 26, 2008

Projected Supplemental Income Based on an Average Annual Increase of 6%¹

\$205,550.41

Discounted Value of Future Supplemental Income

\$205,550.41

¹In my opinion, future supplemental earnings should increase at an average annual rate of 6%. Therefore, the lost supplemental income would be \$205,550.41 discounted at 5% to November 26, 2008.

TABLE VI

Mr. Scott W. Vincent

ESTIMATE OF THE VALUE OF

LOST HOUSEHOLD SERVICES1

Discounted at 5% to November 26, 2008

Loss Based on a 6% Average Increase in Value of Services

\$144,357.48

Discounted Value of Lost Household Services

\$144,357.48

¹This estimate of lost household services was based on the current value of contributions estimated at \$3,065.00 per year.

TABLE VII

Mr. Scott W. Vincent

LIFE CARE PLAN1

	Discounted at 5% to November 26, 2008
Projected Evaluations	\$80,563.69
Projected Therapeutic Modalities	\$107,619.45
Wheelchair(s)/Mobility/Maintenance	\$421,761.66
Orthotics/Prosthetics	\$25,745.82
Durable Medical Items	\$105,907.33
Aids for Independent Function	\$87,784.98
Supplies	\$172,288.95
Medication(s)	\$373,892.59

Table VII - cont'd.

Discounted at 5% to November 26, 2008

Home Care/Facility Care

Option I:

\$10,137,933.95

Option II:

\$10,692,672.13

Future Medical Care Routine

\$130,519.36

Transportation

\$385,000.00

Architectural Renovation(s)

\$57,426.09

Acute Medical Intervention

\$996,884.97

Sexual Options

Undetermined

Surgical Intervention

Undetermined

Potential Complications²

Undetermined

TOTAL DISCOUNTED VALUE OF LIFE CARE PLAN

Option I:

\$13,083,328.84

Option II:

\$13,638,067.02

¹The Life Care Plan was prepared by Mrs. Kathy W. Willard, M.Ed., CRC, CDMS, CCM, CLCP, VE, Licensed Professional Counselor, 265 West Pike Street, Ste. A, Lawrenceville, Georgia 30045-4868.

²Because of the uncertainty of the frequency of occurrence of Potential Complications, no monetary value is determined. Significant expenses could occur in the future that are not included in this report.

TABLE VIII

Mr. Scott W. Vincent

SUMMARY OF THE DISCOUNTED VALUE OF LOST EARNING CAPACITY, HOUSEHOLD CONTRIBUTIONS, AND LIFE CARE PLAN

Lost Earning Capacity and Household Contributions

\$2,556,389.94

Discounted Value of Life Care Plan

Option I:

<u>\$13,083,328,84</u>

Option II:

\$13,638,067.02

TOTAL ECONOMIC LOSS RESULTING FROM INJURY

Option I:

<u>\$15,639,718.78</u>

Option II:

\$16,194,456.96

CERTIFICATE

I hereby certify that I have personally made an appraisal of the lost earning capacity and the discounted value of the life care plan of Mr. Scott W. Vincent and that no important factors significantly affecting the value were knowingly overlooked or withheld. I have no present or contemplated future interest therein and the fee received for this assignment is in no way contingent on the value reported. I further certify that to the best of my knowledge and belief the statements and opinions contained herein are correct as set forth.

Robert D. Coston, Ph.D. Robert D. Coston, Ph.D.

APPENDICES

-A-

ANNUITY MORTALITY TABLE FOR 1949, ULTIMATE

Expectation of **Expectation of** Life (Years) Life (Years) Female Male Female Age Male Age 0 73.18 78.69 41 34.22 39.17 77.94 42 33.29 38.22 1 72.47 2 71.59 77.04 43 32.38 37.28 3 76.10 44 31.47 36.35 70.65 4 69.70 75.14 45 30.57 35.41 5 68.75 74.17 46 29.67 34.48 47 33.56 6 67.78 73.19 28.80 7 72.21 66.82 48 27.93 32.64 71.23 49 31.72 8 65.85 27.07 9 70.24 50 64.89 26.23 30.81 63.92 69.26 51 25.40 29.91 10 68.27 52 11 62.95 24.58 29.01 12 61.98 67.29 53 23.78 28.11 66.30 13 61.01 54 22.98 27.22 60.04 65.32 55 22.20 26.33 14 59.07 64.33 56 25.46 15 21.44 16 58.10 63.35 57 20.68 24.59 17 62.37 58 23.72 57.13 19.93 18 56.17 61.39 59 19.20 22.87 19 55.20 60.41 60 22.02 18.48 20 54.23 59.43 61 17.76 21.18 21 53.26 58.45 62 17.06 20.36 22 52.30 57.48 63 16.37 19.54 23 56.50 64 51.33 15.68 18.73 24 50.37 55.53 65 15.01 17.94 25 54.55 66 14.36 49.41 17.16 26 48.44 53.58 67 13.71 16.39 27 47.48 52.61 68 13.08 15.64 28 46.52 51.64 69 12.46 14.90 70 29 45,56 50.67 11.86 14.18 30 44.61 49.70 71 11.28 13.47 31 48.73 72 12.78 43.65 10.71 32 42.70 47.77 73 10.15 12.11 46.80 74 33 41.74 9.61 11,45 40.79 45.84 75 9.09 10.82 34 35 39.85 44.88 76 8.58 10.20 36 38.90 43.92 77 8.10 9.60 37 37.96 42.97 78 9.02 7.63 38 37.02 42.01 79 8.47 7.17 39 41.06 80 7.93 36.08 6.74 40 35.15 40.11 81 6.32 7.42

Case 1:08-cv-00067-DHB-WLB Document 32 Filed 12/04/08 Page 80 of 89

Expectation of Life (Years)			Expectation of Life (Years)		
Age	Male	Female	Age	Male	Female
82	5.92	6.93	96	2.10	2.24
83	5.54	6.46	97	1.94	2.05
84	5.18	6.01	98	1.79	1.87
85	4.84	5.58	99	1.65	1.71
86	4.51	5.18	100	1.52	1.56
87	4.20	4.79	101	1.40	1.42
88	3.90	4.43	102	1.29	1.30
89	3.62	4.09	103	1.20	1.19
90	3.36	3.77	104	1.10	1.09
91	3.12	3.47	105	1.02	0.99
92	2.88	3.19	106	0.94	0.91
93	2.67	2.92	107	0.86	0.83
94	2.47	2.68	108	0.75	0.73
95	2.28	2.45	109	0.50	0.50

Cross references.--As to admissibility of this table in cases of wrongful death or permanent personal injury, see 24-4-45.

Source:

Official Code of Georgia Annotated, Volume 20, Title 24, Evidence.

ROBERT D. COSTON

Post Office Box 1398 Statesboro, Georgia 30459

CURRENT POSITION

Emeritus Professor of Economics, Department of Finance and Economics, Georgia Southern University, Statesboro, Georgia

ACADEMIC EXPERIENCE

Professor of Economics, College of Business Administration,
GEORGIA SOUTHERN UNIVERSITY

1991-2001
STATESBORO, GEORGIA

Associate Dean of the School of Business and Director,
Center for Management Development
GEORGIA SOUTHERN UNIVERSITY
1988 - 1991
STATESBORO, GEORGIA

Professor and Head, Department of Economics

Georgia Southern University

1985 - 1988
Statesboro, Georgia

Associate Professor and Head, Department of Economics 1975 - 1985
GEORGIA SOUTHERN UNIVERSITY STATESBORO, GEORGIA

Assistant Professor and Acting Head, Department of Economics
Georgia Southern University

Assistant Professor, Department of Economics

Georgia Southern University

1970 - 1972

Statesboro, Georgia

EDUCATION

Bachelor of Science in Business Administration Northeast Louisiana University

Master of Business Administration Northeast Louisiana University

Doctor of Philosophy in Economics University of Arkansas

Graduated 1965 MONROE, LOUISIANA

STATESBORO, GEORGIA

1972 - 1975

Graduated 1967 Monroe, Louisiana

Graduated 1973
FAYETTEVILLE, ARKANSAS

FIELDS OF SPECIALIZATION

- Monetary Theory
- Macroeconomic Theory
- Business Economics
- Economic Education
- · Economic Development

Robert D. Coston

PUBLICATIONS

- "Regional Economic Development: The Role of the School of Business," Proceedings of the Midsouth Academy of Economics and Finance, 1991, pg. 149-152.
- "Manufacturing Training Needs in the Sunbelt," Atlantic Economic Journal, Abstract, March 1991, Vol. XIX, No. 1, p. 73.
- "Manufacturing Training Needs in the Sunbelt," Atlantic Economic Society Best Paper PROCEEDINGS, January 1991, Vol. 1, No. 1, p. 122.
- "The Roles of Faculty Activities, Academic Ranks and Sex Discrimination in Determining Faculty Salaries," Proceedings of the Southwestern Society of Economists, 1988, p. 20 with Robert W. Stone (Abstract).
- "Economic Development As An Emerging Mission of Schools of Business," Proceedings of the Western Social Science Association, April 26-29, 1989, p. 14 (Abstract).
- "Managerial Perspectives of the Shorter Workweek in Georgia Manufacturing Firms," Atlantic Economic Journal, April 1974, pp. 62-69, (co-author).
- "Toward a Four-Day Workweek: A Survey in Georgia's Apparel Industry," Atlanta Economic Review, September-October, 1973, pp. 26-27, (new title - Business).
- "Courses in Economics Should be Required," Southern Business Review, 4th quarter, 1974, (co-author).
- "The Extent of Economics Education in the Secondary School Systems in Georgia," The Dekalb Business and Economic Journal, Vol. 3, (Fall 1975), (co-author).
- "Pareto Optimality of Policy Proposals With Probabilistic Voting" a published commentary, Atlantic Economic Journal, Vol. X, No. 1, (March 1982).
- "U.S. Sugar Regulation From the Urban Consumer Point of View" a published commentary, Atlantic Economic Journal, Vol. XI, No. 1, (March 1983).
- "An Examination of a State Mandate Requiring an Economics Course in High Schools: A Case Study of the Effects of Economic Education in Georgia" a published commentary, Atlantic Economic Journal, Vol. XII, No. 1, (March 1984), (co-author).
- "Teaching Price Elasticity of Demand in Principles of Microeconomics Courses" a published commentary, Atlantic Economic Journal, Vol. XII, No. 1, (March 1984), (co-author).

HONORS, CIVIC AND PROFESSIONAL AFFILIATIONS

- Founder and Member of Board of Directors, Eagle Bank and Trust 1990 to present
- Member, Board of Directors, Eagle Bancorp, Inc.
- Past Member, Economic Development Committee, Statesboro-Bulloch County Chamber of Commerce
- Past Member, Strategic Planning Committee, Statesboro Bulloch County Chamber of Commerce - 1995
- President, Statesboro-Bulloch County Chamber of Commerce 1988
- Development Authority of Bulloch County 1986 to 1989
- President, Georgia Association of Economics and Finance 1986
- President, Statesboro Optimist Club 1973

- Outstanding Young Men of America 1976
- Honored as Outstanding Teacher 1977
- President, Midday Optimist Club of Statesboro 1978-1979
- Lieutenant Governor, Georgia District, Optimist International -1980-1981
- Omicron Delta Epsilon
- Beta Gamma Sigma
- Delta Sigma Pi

ROBERT D. COSTON, Ph.D.

CONSULTING ECONOMIST

EMERITUS PROFESSOR OF ECONOMICS COLLEGE OF BUSINESS ADMINISTRATION GEORGIA SOUTHERN UNIVERSITY PLEASE REPLY TO: POST OFFICE BOX 1398 STATESBORO, GEORGIA 30459 VOICE: 912/489-5162 FAX: 912/764-0840

June 30, 2008

TO WHOM IT MAY CONCERN:

Below is the fee schedule for services regarding appraisals of economic losses.

Appraisal Fee:

\$4,950.00

Research and Consultation:

\$350.00 an hour

Testimony Fee and

Court Appearance:

\$4,950.00

Deposition Fee:

\$2,475.00

Travel Time:

\$175.00 an hour

Mileage:

.51 per mile

If you have any additional questions regarding my fees, please contact me at your earliest convenience.

Sincerely,

Robut A. Colm M.D.

Robert D. Coston, Ph.D.

Isw

LIST OF CASES

- 1. Attorney Lance A. Cooper/Client J. Wayne Stowers, M.D.
- 2. Attorney Andrew W. Jones/Client Deidra E. Marsh
- 3. Attorney Cale Conley/Client Freddie J. Johnson, Sr.
- 4. Attorney Mark E. Robinson/Client Bartlett
- 5. Attorney Randal D. Getz/Client DeMarcus Rowe
- 6. Attorney Simone R. Siex/Client Joshua R. Norberg
- 7. Attorney William B. King/Client Ashley A. Jones
- 8. Attorney Susan Cremer/Client Carolyn S. Turnbull
- Attorney Raymond G. Chadwick, Jr./Client Fatisha Drayton, Mulika Simmons, and Mulik Simmons
- Attorney Scott B. Cooper/Client Derrick L. Randall, Kanisha L. Reynolds, and
 Victor E. Reynolds
- 11. Attorney David Wm. Boone/Client Cedric A. Barovero
- 12. Attorney Gerald W. Bassett/Client Kathy Melinda Boatright
- 13. Attorney Robert C. Buck/Client Phyllis D. Hodges
- 14. Attorney Harvey R. Spieget/Client Cantrell
- 15. Attorney Peter L. Kaufman/Client Teri Murphy
- 16. Attorney Douglas J. Gunn/Client Lewis
- 17. Attorney George W. Fryhofer III/Client Neal
- 18. Attorney Albert M. Pearson/Client Steven Lynn
- 19. Attorney Lance Cooper/Client Howard
- 20. Attorney Douglas Kertscher/Client Ervast

- 21. Attorney Patrick C. DiCarlo/Client Flexible Products
- 22. Attorney Guy Weiss/Client Oxley
- 23. Attorney Stephen L. Goldner/Client Nancy E. Edwards
- 24. Attorney Frank W. Spector/Client Keiarra Davis
- 25. Attorney Leigh Martin May/Clients Mr. Joshua P. Fowler and Mr. Anthony Fowler
- 26. Attorney Barry L. Roseman/Client William Nolen Church
- 27. Attorney Brent J. Savage/Client Ronald H. Pierson
- 28. Attorney David Wm. Boone/Client Benny Ray Davenport
- 29. Attorney Michael B. King/Client Ashley A. Jones
- 30. Attorney Charles H. Allen/Client Donald D. Snyder
- 31. Attorney Robert J. Dickman, Jr./Client Trevon Bethell
- 32. Attorney David Wm. Boone/Client Adrian F. Bulman
- 33. Attorney Andrew J. Hill, III/Client Hayden E. James
- 34. Attorney Matthew E. Cook/Client Mallory Mitcham and Tony Mitcham
- 35. Attorney Richard H. Middleton, Jr./Client Jerry Ray Gannon
- 36. Attorney Joshua Sacks/Client Martha Ann Sellers
- 37. Attorney Susan Cremer/Client Kyla Rosie Kesterson
- 38. Attorney George W. Fryhofer, III/Client Gibson
- 39. Attorney C. Wes Pittman/Client Wegreyn
- 40. Attorney Robert L. Jenkins/Client Leon E. Fortner, Jr.
- 41. Attorney David Boone/Client Winston Chen
- 42. Attorney Jeffrey Lasky/Client Manuel S. Silvas, Jr.
- 43. Attorney John C. Patton/Client Coy T. Musgrove

- 44. Attorney David Wm. Boone/Joshua Coleman
- 45. Attorney Craig Webster/Villegas
- 46. Attorney Andrew J. Hill, III/Black
- 47. Attorney Henry G. Garrard, III/Reynolds
- 48. Attorney David W. Adams/Elijah P. Elliott
- 49. Attorney Frederick S. Bergen/Jasmine Zhang
- 50. Attorney James Nobles, Jr./Henry Fairbanks Richardson
- 51. Attorney William H. Pinson/Jarrard
- 52. Attorney Jason L. Crawford/Jo Ann Pierce
- 53. Attorney LaBarron N. Boone/Willie Sam Martinez
- 54. Attorney Frederick S. Bergen/Rose Blanton
- 55. Attorney Timothy O'Brien/George Crocker
- 56. Attorney Gerald Davidson/Long
- 57. Attorney Alan Hamilton/Emily Neal
- 58. Attorney Erik H. Olson/Antoinette D. Hastings
- 59. Attorney Scott Cooper/D. Randall, K. Reynolds, V. Reynolds
- 60. Attorney Elizabeth Pelypenko/Djatchi
- 61. Attorney Matthew E. Cook/Kenneth D. Slaton
- 62. Attorney Zachary H. Thomas/Keelan Moss
- 63. Attorney James R. Coppage/Jessica Karwacki
- 64. Attorney J. Bradley Stevens/Shannon Smith
- 65. Attorney J. Michael McGarity/Tanner

- 66. Attorney William S. Stone/Joel D. Martin
- 67. Attorney Paul C. Ballou/James N. Pearce
- 68. Attorney Steven Cotter/Tanner
- 69. Attorney LaBarron N. Boone/Colette A. Martinez
- 70. Attorney Matthew E. Cook/Lynn Burns
- 71. Attorney George E. Fryhofer/Kimberly W. Hampton
- 72. Attorney Zachary H. Thomas/Joseph D. Atkinson
- 73. Attorney Christopher Byrd/Wahyu Kuntoaji and Ni Made Trisnawati
- 74. Attorney Josh B. Wages/Alewine vs. Alewine
- 75. Attorney Yehuda Smolar/Sanders
- 76. Attorney D. Leon Ashford/Goyer
- 77. Attorney Dale E. Akins/Jeremy Arriaga
- 78. Attorney Matthew E. Cook/Kenneth Jason Bennett
- 79. Attorney Leigh Martin May/Krystal G. Brazelton
- 80. Attorney Mary Clare Bonaccorsi/Dr. Wood
- 81. Attorney Lance Cooper/J. Campagna
- 82. Attorney Williams Pinson/Mr. Jason Jody Jarrard
- 83. Attorney David Wm. Boone/Staff Sergeant Stephanie I. Sherwood
- 84. Attorney Leigh Martin May/Baby Boy Katz

- 85. Attorney Peter Law/Thursby
- 86. Attorney Susan M. Cremer/Kyle R. Kesterson
- 87. Attorney Andrew J. Hill, III/Bentley
- 88. Attorney Chrisna D. Jones/Margo T. Grice
- 89. Attorney Jefferson Callier/Brinson
- 90. Attorney Alan J. Hamilton/Frederick J. Williams
- 91. Attorney Alan J. Hamilton/Lynn H. Wheeler
- 92. Attorney Raymond G. Chadwick, Jr./Eiland
- 93. Attorney Frederick J. Jekel/NFLPA/NFL
- 94. Attorney Leigh Martin May/Beck
- 95. Attorney Daniel B. Snipes/Todd E. Brady
- 96. Attorney Craig H. Stafford/Na'im Harris
- 97. Attorney Henry G.I Garrard, III/Reynolds
- 98. Attorney Peter Law/Fitts
- 99. Attorney PeterAndrew Lampros/Brad E. Foreman
- 100. Attorney Carr G. Dodson/Hornbeck
- 101. Attorney Peter Daughtery/Lozano
- 102. Attorney Stephen L. Cotter/Hong Quy Vo and Lien Tran

Revised: 10/23/2008